

08 CV 2778

CLOSED, STAY-CASE, STD

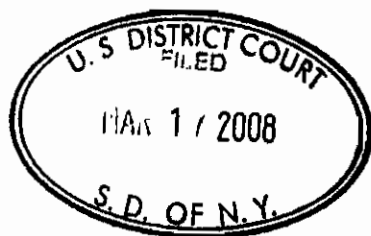
**U.S. District Court
DISTRICT OF ARIZONA (Phoenix Division)
CIVIL DOCKET FOR CASE #: 2:07-cv-01203-PGR**

PlayShare, PLC et al v. Societe Des Bains De Mer Et Du
Cercle Etrangers A Monaco
Assigned to: Judge Paul G Rosenblatt
Cause: 28:2201 Declaratory Judgement

Date Filed: 06/19/2007
Date Terminated: 02/25/2008
Jury Demand: None
Nature of Suit: 840 Trademark
Jurisdiction: Federal Question

Plaintiff

PlayShare, PLC
a UK corporation



represented by **Cynthia Dawn Beck**
Schmeiser Olsen & Watts LLP
18 E University Dr
Ste 101
Mesa, AZ 85201
480-655-0073
Fax: 480-655-9536
Email: cbeck@iplawusa.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Lucan Toh
an individual

represented by **Cynthia Dawn Beck**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Max Wright
an individual

represented by **Cynthia Dawn Beck**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

**Societe Des Bains De Mer Et Du
Cercle Etrangers A Monaco**
a foreign corporation

represented by **John C West**
Jennings Strouss & Salmon PLC
201 E Washington
Ste 1100
Phoenix, AZ 85004-2385
602-262-5900
Fax: 602-495-2663

Email: jwest@jsslaw.com
 ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
06/19/2007	<u>1</u>	COMPLAINT. Filing fee received: \$ 350.00, receipt number 1295847, filed by PlayShare, PLC, Lucan Toh, Max Wright.(Beck, Cynthia) (Entered: 06/19/2007)
06/19/2007	<u>2</u>	Corporate Disclosure Statement by PlayShare, PLC. (Beck, Cynthia) (Entered: 06/19/2007)
06/19/2007	<u>3</u>	Additional Attachments to Main Document re <u>1</u> Complaint <i>Civil Cover Sheet</i> by Plaintiffs PlayShare, PLC, Lucan Toh, Max Wright. (Beck, Cynthia) (Entered: 06/19/2007)
06/19/2007		This case has been assigned to the Honorable Paul G. Rosenblatt. All future pleadings or documents should bear the correct case number: CIV-07-1203-PHX-PGR. (entered by HLA) (Entered: 06/20/2007)
06/26/2007	<u>4</u>	NOTICE TO FILER OF DEFICIENCY re: <u>1</u> Complaint filed by Cynthia Dawn Beck. Description of deficiency: The following required documents were not attached: summonses. (HLA) (Entered: 06/26/2007)
06/26/2007	<u>5</u>	Additional Attachments to Main Document re <u>1</u> Complaint <i>Civil Summons</i> by Plaintiffs PlayShare, PLC, Lucan Toh, Max Wright. (Beck, Cynthia) (Entered: 06/26/2007)
06/27/2007	<u>6</u>	Additional Attachments to Main Document re <u>1</u> Complaint <i>Summons in a Civil Case</i> by Plaintiffs PlayShare, PLC, Lucan Toh, Max Wright. (Beck, Cynthia) (Entered: 06/27/2007)
06/28/2007	<u>7</u>	Summons Issued as to Societe Des Bains De Mer Et Du Cercle Etrangers A Monaco.(Attachments: # <u>1</u> Magistrate Consent Form)(HLA) *** IMPORTANT: You must select "Document and stamps" or "Document and comments" on the print screen in order for the court seal to appear on the summons you print. (Entered: 06/28/2007)
07/18/2007	<u>8</u>	First MOTION to Change Venue/Transfer Case to United States District Court for the Southern District of New York by Societe Des Bains De Mer Et Du Cercle Etrangers A Monaco. (Attachments: # <u>1</u> Exhibit Declaration of Bernard Lambert# <u>2</u> Exhibit A to Lambert Declaration# <u>3</u> Exhibit B-1 to Lambert Declaration# <u>4</u> Exhibit B-2 to Lambert Declaration# <u>5</u> Exhibit B-3 to Lambert Declaration# <u>6</u> Exhibit B-4 to Lambert Declaration# <u>7</u> Exhibit B-5 to Lambert Declaration# <u>8</u> Exhibit C-1 to Lambert Declaration# <u>9</u> Exhibit C-2 to Lambert Declaration# <u>10</u> Exhibit C-3 to Lambert Declaration# <u>11</u> Exhibit C-4 to Lambert Declaration# <u>12</u> Exhibit C-5 to Lambert Declaration# <u>13</u> Exhibit D to Lambert Declaration# <u>14</u> Exhibit Declaration of Matthew James Dick# <u>15</u> Exhibit 1-9 to Dick Declaration)(West, John) (Entered: 07/18/2007)
08/01/2007	<u>9</u>	MOTION to Stay re Motion <i>Defendant's Motion to Transfer or, In the Alternative, to Dismiss</i> by PlayShare, PLC, Lucan Toh, Max Wright. (Beck,

		Cynthia) (Entered: 08/01/2007)
08/01/2007	<u>10</u>	MEMORANDUM re: Memorandum re <u>9</u> MOTION to Stay re Motion <i>Defendant's Motion to Transfer or, In the Alternative, to Dismiss</i> by Plaintiffs PlayShare, PLC, Lucan Toh, Max Wright. (Attachments: # <u>1</u> Exhibit 1 Part 1# <u>2</u> Exhibit 1 Part 2# <u>3</u> Exhibit 2# <u>4</u> Exhibit 3# <u>5</u> Exhibit 4)(Beck, Cynthia) (Entered: 08/01/2007)
08/13/2007	<u>11</u>	RESPONSE to Motion re <u>9</u> MOTION to Stay re Motion <i>Defendant's Motion to Transfer or, In the Alternative, to Dismiss</i> filed by Societe Des Bains De Mer Et Du Cercle Etrangers A Monaco. (Attachments: # <u>1</u> Text of Proposed Order Order to Stay SBM's Motion to Transfer Or, In the Alternative, Motion to Dismiss)(West, John) (Entered: 08/13/2007)
09/25/2007	<u>12</u>	STIPULATION <i>Re Pretrial Discovery</i> by Societe Des Bains De Mer Et Du Cercle Etrangers A Monaco. (Attachments: # <u>1</u> Text of Proposed Order Re Pretrial Discovery)(West, John) (Entered: 09/25/2007)
10/11/2007	<u>13</u>	ORDER - IT IS ORDERED that the plas <u>9</u> Motion to Stay Defendant's Motion to Transfer or, in the Alternative, to Dismiss is granted to the extent that this action is stayed in its entirety pending the resolution of the plas pending motion to dismiss filed in the United States District Court for the Southern District of New York. FURTHER ORDERED that the dfts <u>8</u> Motion to Transfer or, in the Alternative, to Dismiss is deemed withdrawn without prejudice to being reinstated upon motion if necessary after the resolution of the plas pending motion to dismiss filed in the United States District Court for the Southern District of New York. FURTHER ORDERED that the parties' <u>12</u> Stipulation re Pretrial Discovery is accepted. FURTHER ORDERED that the parties shall file a status report with the Court no later than fifteen days after the resolution of the plas pending motion to dismiss, filed in the United States District Court for the Southern District of New York, setting forth the decision of the New York court and the impact of that decision on this action. Signed by Judge Paul G Rosenblatt on 10/11/07. (SAT) (Entered: 10/11/2007)
02/21/2008	<u>14</u>	STATUS REPORT by Societe Des Bains De Mer Et Du Cercle Etrangers A Monaco. (West, John) (Entered: 02/21/2008)
02/21/2008	<u>15</u>	STIPULATION by Societe Des Bains De Mer Et Du Cercle Etrangers A Monaco. (Attachments: # <u>1</u> Text of Proposed Order)(West, John) (Entered: 02/21/2008)
02/25/2008	<u>16</u>	ORDER OF TRANSFER that the parties' Stipulation <u>15</u> is accepted and this action is transferred to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404(a). Signed by Judge Paul G Rosenblatt on 2/25/08. (KMG) (Entered: 02/25/2008)
03/11/2008	<u>17</u>	Miscellaneous Document: Transfer Letter from U.S. District Court, District of Arizona to U.S. District Court, Southern District of New York along with certified copies of transfer order and docket sheet. (KMG) (Entered: 03/11/2008)

PACER Service Center			
Transaction Receipt			
03/11/2008 12:02:33			
PACER Login:	us4935	Client Code:	
Description:	Docket Report	Search Criteria:	2:07-cv-01203-PGR
Billable Pages:	2	Cost:	0.16

Hereby attest and certify on 3/11/08
 that the foregoing document is a full, true and correct
 copy of the original on file in my office and in my cus-
 tody.
 CLERK, U.S. DISTRICT COURT
 DISTRICT OF ARIZONA
 By Kathleen M. Decker Deputy

Cynthia Dawn Beck - #022345
SCHMEISER, OLSEN & WATTS, LLP
18 E. University Drive, Suite 101
Mesa, Arizona 85201
Telephone: (480) 655-0073

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

PLAYSHARE PLC, a UK corporation,
LUCAN TOH, an individual; and
MAX WRIGHT, an individual

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET
DU CERCLE DES ETRANGERS A
MONACO, a foreign corporation,

Defendant.

Case No.

**COMPLAINT FOR
DECLARATORY JUDGMENT**

Plaintiffs, by and through undersigned counsel, bring this Complaint against Defendant Societe Des Bains De Mer Et Du Cercle Des Etrangers A Monaco ("SBM") alleges as follows:

INTRODUCTION

1. This action is requesting a declaration that Plaintiffs are entitled to the use of the disputed domain names listed below and that there has been no infringement of U.S. Trademark Registration Number 3,031,006 (hereinafter, the "'006" Mark, attached hereto as Exhibit A) and no infringement of the unregistered mark "CASINO DE

1 MONTE-CARLO” (hereinafter “CDM Mark”, collectively the “Marks”) owned by
2 Defendant SBM, and that the Marks are invalid and/or unenforceable. This action
3 arises under the Declaratory Judgment Act, 28 United States Code §§ 2201 and 2202;
4 the Anticybersquatting Consumer Protection Act, 15 United States Code § 1114 and 28
5 United States Code § 1331 (hereinafter “ACPA”; the trademark laws of the United
6 States Title 15 USC § 1051, *et seq.*; and the Uniform Dispute Resolution Policy
7 paragraph 4(K) (hereinafter “Policy”).
8

9 casinograndmonaco.com
10 casinograndmonaco.net
11 casinograndmonaco.org
12 deutschesgrandmonaco.com
13 grandmonacoayda.com
14 grandmonacoayuda.com
15 grandmonacobingo.com
16 grandmonacobingo.net
17 grandmonacocasinoclub.com
18 grandmonacocasinoclub.net
19 grandmonacocasinoclub.org
20 grand-monaco-casino.com
21 grandmonacocasino.com
22 grandmonacocasino.net
23 grandmonacocasino.org
24 grandmonacoclub.com
25 grand-monaco.com
grandmonaco.com
grandmonacocraps.com
grandmonacogames.com
grandmonacogames.net
grandmonacogaming.com
grandmonacogaming.net
grandmonacohosts.com
grandmonacohosts.com
grandmonacolottery.com
grandmonacolottery.net
grandmonacolotto.com
grandmonacolounge.com

1 grandmonacomahjong.com
2 grandmonacomillions.com
3 grandmonacomillions.net
4 grandmonacomillions.org
5 grandmonaco.net
6 grandmonaconews.com
7 grandmonacoonlinecasino.com
8 grandmonacoonlinegaming.com
9 grandmonacoonlinepoker.com
10 grandmonaco.org
11 grandmonacopartners.com
12 grandmonacoplayersclub.net
13 grandmonacopokerclub.com
14 grandmonacopokerclub.net
15 grandmonacopokerclub.org
16 grand-monaco-poker.com
17 grandmonacopoker.com
18 grandmonacopoker.net
19 grandmonacopoker.org
20 grandmonacopromotions.com
21 grandmonacoracebook.com
22 grandmonacoracebook.net
23 grandmonacoracebook.org
24 grandmonacorewards.com
25 grandmonacoskillgames.com
grandmonacoskillgames.net
grandmonacoslots.com
grandmonacosportsbook.com
grandmonacosportsbook.net
grandmonacosports.com
grandmonacosports.net
grandmonacostore.com
grandmonacosupport.com
grandmonacovideopoker.com

(Hereinafter collectively “Subject Domain Names”).

THE PARTIES

2. Plaintiff Lucan Toh is a foreign national residing in the United Arab Emirates.

1 Code § 1114 and 28 United States Code § 1331; Title 28, United States Code, Section
2 1338(a) and 15 United States Code, Section 1121.

3 12. Venue properly lies in this district pursuant to 28 U.S.C. §§ 1391(b).

4 **BACKGROUND**

5
6 13. On or between October 23, 2004 and October 23, 2006, Plaintiffs Lucan
7 Toh and Max Wright acquired the Subject Domain Name registrations on behalf of
8 PlayShare PLC and its predecessors.

9 14. On February 20, 2007, Defendant filed an action with the World
10 Intellectual Property Organization (hereinafter “WIPO”) Arbitration and Mediation
11 Center alleging that the Subject Domain Names are all confusingly similar to its Marks.
12

13 15. A WIPO panel ruled against Plaintiffs PlayShare PLC, Lucan Toh and
14 Max Wright and ordered that all of the Subject Domain Names be transferred to SBM.

15 **COUNT I**

16 **DECLARATORY JUDGMENT THAT PLAINTIFFS’ USE OF THE SUBJECT** 17 **DOMAIN NAMES IS IN COMPLIANCE WITH THE ACPA**

18 16. Plaintiffs incorporate each of the statements and allegations set forth in
19 paragraphs 1-15 above as if fully set forth herein.

20 17. SBM’s attempt to acquire the Subject Domain Names constitutes Reverse
21 Domain Name Hijacking under the ACPA for the following reasons:
22

23 (a) Plaintiffs are the registrants of the Subject Domain Names.

24 (b) Plaintiffs’ domain names were ordered transferred pursuant to the
25 WIPO arbitration proceeding to SBM.

1 (c) SBM has notice of the claim concurrent herewith.

2 (d) Plaintiffs' use of the Subject Domain Names is not unlawful, as the
3 Subject Domain Names are not confusingly similar to the Marks and the use of the
4 Subject Domain Names is not in bad faith.
5

6 18. Plaintiffs are entitled to a declaration that their use of the Subject Domain
7 Names is in compliance with the ACPA.

8 **COUNT II**

9 **DECLARATORY JUDGMENT OF INVALIDITY**
10 **AND UNENFORCEABILITY OF THE '006 MARK AND NON-**
11 **INFRINGEMENT**

12 20. Plaintiffs incorporate each of the statements and allegations set forth in
13 paragraphs 1-19 above as if fully set forth herein.

14 21. The '006 Mark is invalid, unenforceable, and void or that Plaintiffs' use
15 of the Subject Domain Names does not infringe the '006 Mark, for one or more of the
16 following reasons:

17 (a) The '006 Mark is invalid due to repeated fraud on the United States
18 Patent and Trademark Office (hereinafter "USPTO") without which the trademark
19 registration would not have issued.
20

21 (b) The '006 Mark is invalid due to repeated misuse of the trademark
22 through Defendant's repeated attempts to enforce a trademark that it knows to be
23 invalid due to fraud on the United States Trademark Office.
24
25

1 (c) The '006 Mark is invalid due to SBM's failure to disclaim the
2 geographically descriptive term "MONACO" apart from its use within the '006 Mark as
3 a whole.

4 (d) The '006 Mark is invalid due to SBM's failure to use the mark in
5 commerce as defined under the trademark laws of the United States.

6 (e) The Subject Domain Names do not infringe the Mark as the
7 Subject Domain Names are not confusingly similar to the '006 Mark.

8 (f) The Subject Domain Names do not infringe the '006 Mark as the
9 Subject Domain Names and the Mark are not used in conjunction with similar services
10 or products.

11 (g) Defendant's fraud on the USPTO and/or failure to use the '006
12 Mark in commerce renders it unenforceable.

13 22. Because the '006 Mark is invalid and/or unenforceable, the Plaintiffs are
14 entitled to use of the Subject Domain Names.

15 23. Because the Subject Domain Names do not infringe the '006 Mark, the
16 Plaintiffs are entitled to use of the Subject Domain Names.

17 **COUNT III**

18 **DECLARATORY JUDGMENT OF UNENFORCEABILITY**
19 **OF THE CDM MARK AND NON-INFRINGEMENT**

20 24. Plaintiffs incorporate each of the statements and allegations set forth in
21 paragraphs 1-23 above as if fully set forth herein.

1 25. The CDM Mark is unenforceable in the United States because SBM does
2 not use the CDM Mark in commerce as required under 15 USC §§ 1051, 1127.

3 26. Even if SBM could show “use in commerce”, the Subject Domain Names
4 do not infringe the Mark as the Subject Domain Names are not confusingly similar to
5 the CDM Mark.

6 27. Even if SBM could show “use in commerce”, the Subject Domain Names
7 do not infringe the CDM Mark as the Subject Domain Names and the Mark are not used
8 in conjunction with similar services or products.

9 28. Because the CDM Mark is unenforceable, the Plaintiffs are entitled to use
10 of the Subject Domain Names.

11 29. Because the Subject Domain Names do not infringe the CDM Mark, the
12 Plaintiffs are entitled to use of the Subject Domain Names.

13 **WHEREFORE**, Plaintiffs pray for the following relief:

14 (a) Entry of judgment that said Defendant is without right or authority to
15 threaten or to maintain suit against Plaintiffs for alleged infringement of the Marks.

16 (b) Entry of judgment that Plaintiffs’ use of the Subject Domain Names is in
17 compliance with the ACPA.

18 (c) Entry of judgment that the ‘006 Mark is invalid, unenforceable, and void
19 in law; and that said Mark is not infringed by Plaintiffs because of the making, selling,
20 or using of the Subject Domain Names.

1 (d) Entry of judgment that the CDM Mark is unenforceable and that said
2 Mark is not infringed by Plaintiffs because of the making, selling, or using of the
3 Subject Domain Names.

4 (e) Entry of judgment that the Plaintiffs are entitled to the use of the Subject
5 Domain Names and for suspension of the WIPO Judgment ordering transfer of the
6 domain names to SBM.

7 (f) Entry of judgment for Plaintiffs' costs and reasonable attorney fees
8 incurred herein.

9 (g) For such other and further relief as the Court may deem appropriate.

10 SCHMEISER, OLSEN & WATTS LLP

11 By:

12 /s/

13 CYNTHIA D. BECK
14 Attorney for Plaintiffs

Cynthia Dawn Beck - #022345
SCHMEISER, OLSEN & WATTS, LLP
18 E. University Drive, Suite 101
Mesa, Arizona 85201
Telephone: (480) 655-0073

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

LUCAN TOH, an individual; MAX
WRIGHT, an individual; and
PLAYSHARE PLC, a foreign
corporation,

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET
DU CERCLE DES ETRANGERS A
MONACO, a foreign corporation,

Defendant.

Case No.

**CORPORATE DISCLOSURE
STATEMENT**

This Corporate Disclosure Statement is filed on behalf of PlayShare PLC, in compliance with Rule 7.1, Federal Rules of Civil Procedure. PlayShare PLC is a nongovernmental company under the laws of the United Kingdom and is a party to this action. There is no parent corporation of PlayShare.com, PLC, nor does any publicly held corporation own 10% or more of its stock.

SCHMEISER, OLSEN & WATTS LLP

By:

/s/

CYNTHIA D. BECK
Attorney for Plaintiffs

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

PLAYSHARE, PLC, A UK CORPORATION; LUCAN TOH, A FOREIGN INDIVIDUAL; MAX WRIGHT, A FOREIGN INDIVIDUAL

(b) County of Residence of First Listed Plaintiff N/A - foreign plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)
Schmeiser, Olsen & Watts, LLP
18 East University Drive, Suite 101
Mesa, Arizona 85201 (480) 655-0073

DEFENDANTS

SOCIETE DES BAINS DE MER ET DU CERCLE DES ETRANGERS A MONACO, A FOREIGN CORPORATION

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input checked="" type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 USC Sec. 2201, 2202; 15 USC Sec. 1051, 1114

VI. CAUSE OF ACTION

Brief description of cause:
Declaratory Judgment of Plaintiffs' entitlement to use disputed Internet domain names.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

06/19/2007

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553
Brief Description: Unauthorized reception of cable service

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

PlayShare, PLC, et al
PLAINTIFF(S)

v.

**Societe Des Bains De Mer Et Du Cercle
Etrangers A Monaco, et al**
DEFENDANT(S)

CASE NO. **CIV-07-1203-PHX-PGR**

NOTICE TO FILER OF DEFICIENCIES IN
ELECTRONICALLY FILED DOCUMENTS

PLEASE TAKE NOTICE:

Pursuant to the Federal Rules of Civil Procedure, and the General Orders, Local Rules, and CM/ECF Administrative Policies and Procedures Manual of this Court, the following deficiency has been found with the electronically filed document, Complaint #1 filed by Cynthia Dawn Beck:

- ☒ The following required documents were not attached: summonses.

ACTION REQUIRED BY THE FILER

- ☒ The deficiency must be corrected within one (1) business day of this notice.
- ☒ File the documents using the event Other Notices found in the Notices category.

UNITED STATES DISTRICT COURT

District of ARIZONA

PLAYSHARE PLC, a UK corporation,
LUCAN TOH, an individual; and
MAX WRIGHT, an individual

SUMMONS IN A CIVIL CASE

V.

CASE NO: 2:07-CV-1203

SOCIETE DES BAINS DE MER ET
DU CERCLE DES ETRANGERS A
MONACO, a foreign corporation.

TO: (Name and address of Defendant)

SOCIETE DES BAINS DE MER ET DU CERCLE DES ETRANGERS A MONACO
Principality of Monaco

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

Cynthia Dawn Beck
SCHMEISER, OLSEN & WATTS, LLP
18 E. University Drive, Suite 101
Mesa, Arizona 85201

an answer to the complaint which is served on you with this summons, within _____ days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

CLERK

DATE

(By) DEPUTY CLERK

AO 440 (Rev. 8/01) Summons in a Civil Action

RETURN OF SERVICE

Service of the Summons and complaint was made by me ⁽¹⁾	DATE
NAME OF SERVER (<i>PRINT</i>)	TITLE

*Check one box below to indicate appropriate method of service***G** Served personally upon the defendant. Place where served: _____**G** Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: _____

G Returned unexecuted: _____**G** Other (specify): _____**STATEMENT OF SERVICE FEES**

TRAVEL	SERVICES	TOTAL
--------	----------	-------

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date_____
*Signature of Server*_____
Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

UNITED STATES DISTRICT COURT

District of ARIZONA

PLAYSHARE PLC, a UK corporation,
LUCAN TOH, an individual; and
MAX WRIGHT, an individual

SUMMONS IN A CIVIL CASE

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Principality of Monaco

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

Cynthia Dawn Beck
SCHMEISER, OLSEN & WATTS, LLP
18 E. University Drive, Suite 101
Mesa, Arizona 85201

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

CLERK

DATE

(By) DEPUTY CLERK

Service of the Summons and complaint was made by me ⁽¹⁾	DATE
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TRAVEL	SERVICES	TOTAL
--------	----------	-------

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Executed on _____
Date

Signature of Server

Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

UNITED STATES DISTRICT COURT

District of ARIZONA

PLAYSHARE PLC, a UK corporation,
LUCAN TOH, an individual; and
MAX WRIGHT, an individual

SUMMONS IN A CIVIL CASE

V.

CASE NO: 2:07-CV-1203

SOCIETE DES BAINS DE MER ET
DU CERCLE DES ETRANGERS A
MONACO, a foreign corporation.

TO: (Name and address of Defendant)

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Principality of Monaco

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

Cynthia Dawn Beck
SCHMEISER, OLSEN & WATTS, LLP
18 E. University Drive, Suite 101
Mesa, Arizona 85201

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

CLERK



(By) DEPUTY CLERK

DATE

AO 440 (Rev. 8/01) Summons in a Civil Action

RETURN OF SERVICE

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Check one box below to indicate appropriate method of service

G Served personally upon the defendant. Place where served: _____

G Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: _____

G Returned unexecuted: _____

G Other (specify): _____

STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL
--------	----------	-------

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

Signature of Server

Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

(For Use In Civil Cases With District Judge as President)

UNITED STATES DISTRICT COURT

_____ District of _____

Plaintiff

v.

Defendant

NOTICE, CONSENT, AND ORDER OF REFERENCE-
EXERCISE OF JURISDICTION BY A UNITED STATES
MAGISTRATE JUDGE

Case Number:

**NOTICE OF AVAILABILITY OF A UNITED STATES MAGISTRATE JUDGE
TO EXERCISE JURISDICTION**

In accordance with the provisions of 28 U.S.C. 636© and Fed.R.Civ.P.73, you are hereby notified that a United States magistrate judge of this district court is available to conduct any or all proceedings in this case including a jury or nonjury trial, and to order the entry of a final judgment. Exercise of this jurisdiction by a magistrate judge is, however, permitted only if all parties voluntarily consent.

You may, without adverse substantive consequences, withhold your consent, but this will prevent the court's jurisdiction from being exercised by a magistrate judge. If any party withholds consent, the identity of the parties consenting or withholding consent will not be communicated to any magistrate judge or to the district judge to whom the case has been assigned.

An appeal from a judgment entered by a magistrate judge shall be taken directly to the United States court of appeals for this judicial circuit in the same manner as an appeal from any other judgment of a district court.

CONSENT TO THE EXERCISE OF JURISDICTION BY A UNITED STATES MAGISTRATE JUDGE

In accordance with the provisions of 28 U.S.C. 636© and Fed.R.Civ.P. 73, the parties in this case hereby voluntarily consent to have a United States magistrate judge conduct any and all further proceedings in the case, including the trial, order the entry of a final judgment, and conduct all post-judgment proceedings.

Signatures	Party Represented	Date
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

ORDER OF ASSIGNMENT

IT IS HEREBY ORDERED that this case be assigned to _____
United States Magistrate Judge, for all further proceedings and the entry of judgment in accordance with 28 U.S.C. 636(c), Fed.R.Civ.P. 73 and the foregoing consent of the parties. All further documents filed with the court are to carry the following case number _____.

_____	_____
Date	United States District Judge

NOTE: RETURN THIS FORM TO THE CLERK OF THE COURT ONLY IF ALL PARTIES HAVE CONSENTED ON THIS FORM TO THE EXERCISE OF JURISDICTION BY A UNITED STATES MAGISTRATE JUDGE.

John C. West - 007233
jwest@jsslaw.com
JENNINGS, STROUSS & SALMON, P.L.C.
A Professional Limited Liability Company
The Collier Center, 11th Floor
201 East Washington Street
Phoenix, Arizona 85004-2385
Telephone: (602) 262-5911

Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

No. 2:07-CV-01203-PGR

**SOCIETE DES BAINS DE MER ET
DU CERCLE DES ETRANGERS A
MONACO'S MOTION TO
TRANSFER OR, IN THE
ALTERNATIVE, TO DISMISS**

(Oral Argument Requested)

Société des Bains de Mer et du Cercle des Etrangers à Monaco ("SBM") moves for an order transferring this proceeding to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404(a) and the "first-to-file" rule. Alternatively, SBM moves for an order: (1) dismissing Counts II and III of the Complaint pursuant to Federal Rule of Civil Procedure ("Fed. R. Civ. P." or "Rule") 12(b)(2); (2) dismissing Plaintiffs' claim for declaratory judgment of invalidity and unenforceability of SBM's registration for the CASINO DE MONACO trademark set forth in Count II of the Complaint pursuant to Fed. R. Civ. P. 9(b) and 12(b)(6); and (3) dismissing Plaintiffs' claim for declaratory judgment of unenforceability of SBM's CASINO DE MONTE-CARLO trademark set forth in Count III of the Complaint

1 pursuant to Fed. R. Civ. P. 12(b)(6). This Motion is supported by the following
 2 Memorandum of Points and Authorities and the Declarations of Bernard Lambert and
 3 Matthew James Dick.
 4

5 **MEMORANDUM OF POINTS AND AUTHORITIES**

6 The same parties to this action are already embroiled in an earlier filed action
 7 brought by the natural plaintiff SBM in the Southern District of New York (the “New
 8 York Action”). Both the New York Action and the instant proceeding attempt to
 9 resolve the same question: whether “Plaintiffs” here (the natural Defendants) have
 10 unfairly traded upon the goodwill of SBM, embodied in its CASINO DE MONACO and
 11 CASINO DE MONTE-CARLO trademarks for casino-related services and goods, by
 12 using the designations “Monaco Casino” and “Monaco” in connection with online
 13 casino gambling services. This Court should therefore transfer this action to the
 14 Southern District of New York so that these identical claims can be heard together.
 15
 16

17 Alternatively, SBM moves to dismiss (1) Counts II and III of the Complaint for
 18 failure to allege a basis for personal jurisdiction over SBM, and (2) Plaintiffs’ claims for
 19 declaratory judgment of invalidity and unenforceability of SBM’s trademarks set forth
 20 in Counts II and III because Plaintiffs have failed to plead fraud with particularity or
 21 state a claim upon which relief can be granted.
 22

23 **FACTUAL BACKGROUND**

24 SBM, a société anonyme organized and existing under the laws of the
 25 Principauté of Monaco, is the founder and manager of five Monaco-based casinos,
 26

1 including the Casino de Monte-Carlo, which has been in operation since April 2, 1863.
 2 (Declaration of Bernard Lambert ("Lambert Decl."), dated July 17, 2007, ¶ 2.) Under
 3 express decree from the authorities of the Principauté of Monaco, SBM is the sole
 4 company that can organize games and gambling in Monaco. (*Id.*) SBM actively
 5 promotes its five Monaco-based casinos, particularly the Casino de Monte-Carlo,
 6 throughout the world and in the United States ("U.S."). (*Id.* ¶ 3.) SBM owns U.S.
 7 Trademark Registration No. 3,031,006, registered December 20, 2005, for the mark
 8 CASINO DE MONACO in connection with casino-related services and goods. (*Id.* at ¶
 9 5.) SBM's application for its CASINO DE MONTE-CARLO mark, Serial No.
 10 76/479,351, is currently pending in the United States Patent & Trademark Office
 11 ("USPTO"). (*Id.*) In addition, SBM owns over one hundred and fifty domain names
 12 incorporating its trademarks that it uses to promote its gaming and casino-related goods
 13 and services.¹ (*Id.*) As a result of SBM's longstanding and extensive advertising, the
 14 terms "Monaco" and "Monte Carlo" embody a tremendous amount of goodwill and
 15 equity for SBM when used in connection with gaming services. (*Id.* ¶ 6.)

16 Many of SBM's marketing and promotional activities are conducted out of,
 17 coordinated by, or documented by records maintained in SBM's New York City office.
 18 (*Id.* ¶ 3.) SBM has maintained this office in conjunction with the Monaco tourism
 19 office for over twenty years for the purpose of promoting and advertising SBM's

20
 21
 22
 23
 24
 25 ¹ These domain names include, among others, <monaco-grand-casino.com>,
 26 <casinosdemonaco.com>, <livemonacocasino.com>, <monacogoldcasino.fr>,
 <monaco-casinos.com>, <monaco-casinos.net>, <monacobestcasino.com>,
 <casinosmonaco.com>, <casinomonacopoker.com>, <casinomontecarlo.com>, and
 <casino-monte-carlo.com>. (Lambert Decl. ¶ 5.)

1 Monaco-based casinos. (*Id.*) SBM promotes its casinos to U.S. consumers through its
2 New York office by participating in trade shows, arranging for advertising through the
3 print and broadcast media, charity partnerships and other charitable activity, direct mail
4 and telephone marketing, and group and individual sales activity. (*Id.* ¶ 4.) Hundreds
5 of brochures advertising SBM's Monaco-based casinos are mailed to clients throughout
6 the U.S. from SBM's New York office every year. (*Id.*) The New York office also
7 functions as an international sales office for SBM, through which consumers are able to
8 book reservations for travel to Monaco and make arrangements for use of SBM's
9 Monaco-based casinos. (*Id.* ¶ 3.)

12 PlayShare PLC ("PlayShare") alleges that it is a corporation organized under
13 the laws of the United Kingdom. (Complaint, filed June 19, 2007² ("Complaint"), ¶ 4.)
14 Plaintiffs Lucan Toh ("Toh") and Max Wright ("Wright," and together with PlayShare
15 and Toh, "Plaintiffs") claim to be foreign nationals, residing in the United Arab
16 Emirates and the United Kingdom, respectively. (*Id.* ¶¶ 2-3.) Plaintiffs claim to own
17 and operate the Grand Monaco Casino, an online gambling website. (*Id.* ¶¶ 6-7;
18 Lambert Decl., Ex. C ("SBM Amended Complaint") ¶¶ 2, 28, 30-31.) In connection
19 with the operation of this website, Plaintiffs have registered and are using at least sixty-
20 six domain names incorporating the terms "Monaco Casino" or "Monaco" (the
21 "Monaco Domain Names"). (Complaint ¶ 1; SBM Amended Complaint ¶¶ 2, 32.)
22 Plaintiffs' websites prominently feature the GRAND MONACO CASINO and GRAND
23
24
25

26

2 Plaintiffs' Complaint is not dated.

1 MONACO designations, undoubtedly to trade off of the tremendous goodwill and brand
2 name equity associated with SBM's Monaco-based casinos. (SBM Amended
3 Complaint ¶¶ 2, 34.)
4

5 On March 21, 2007, SBM initiated a proceeding against Toh and Wright with
6 the World Intellectual Property Organization ("WIPO") for the transfer of the Monaco
7 Domain Names. (Lambert Decl. ¶ 7, Ex. B.) On June 6, 2007, SBM filed suit in the
8 Southern District of New York alleging unfair competition, trademark infringement,
9 cybersquatting, and analogous state and common law claims. (*Id.* ¶ 8; SBM Amended
10 Complaint ¶ 13.) The New York Action and this proceeding comprise just one aspect of
11 a global dispute between SBM and Plaintiffs.³
12

13 WIPO issued a decision on June 11, 2007 in favor of SBM, ordering that the
14 Monaco Domain Names be transferred to it. (Lambert Decl. ¶ 9, Ex. D; Complaint ¶
15 15.) Notwithstanding the pendency of the New York Action in which the same issues
16 are raised, Plaintiffs instituted the instant action for declaratory judgment.⁴ SBM has
17 not yet been served in connection with this proceeding. Meanwhile, Plaintiffs have
18 appeared in the New York Action (along with the other New York Action Defendants)
19 and have been ordered by the Court on consent to file an Answer on or before July 23,
20 2007.
21
22

23
24 ³ In an effort to put an end to the irreparable harm that Plaintiffs are causing to
25 SBM's brand equity on a worldwide scale, SBM has also filed similar proceedings in
26 the United Kingdom and France. (Lambert Decl. ¶ 8; Declaration of Matthew James
Dick ("Dick Decl."), dated July 13, 2007, ¶ 5.)

⁴ Not only were Plaintiffs keenly aware of the existence of the New York
Action prior to filing this suit, but Wright actively sought to evade service. (Dick
Decl. ¶¶ 6-7, 10, 12, 13, 16.)

1 This motion to transfer should be granted because (1) this action is virtually
 2 identical to the prior pending New York Action; (2) this forum is inconvenient for all
 3 parties involved; (3) there is virtually no connection between this forum and any parties
 4 or causes of action alleged in Plaintiffs' Complaint; and (4) the interests of justice would
 5 be best served by trying the matter in New York. In the alternative, SBM moves to
 6 dismiss Counts II and III of the Complaint pursuant to Fed. R. Civ. P. 12(b)(2), as
 7 Plaintiffs fail to establish that SBM is subject to personal jurisdiction of this Court.
 8
 9 SBM further moves to dismiss Plaintiffs' claim for declaratory judgment of invalidity
 10 and unenforceability of SBM's CASINO DE MONACO trademark registration set forth
 11 in Count II of the Complaint under Rules 9(b) and 12(b)(6), as Plaintiffs have failed to
 12 plead fraud claim with particularity or state a claim upon which relief may be granted.
 13
 14 Finally, SBM moves to dismiss Plaintiffs' claim for declaratory judgment of
 15 unenforceability of SBM's CASINO DE MONTE-CARLO trademark set forth in Count
 16 III of the Complaint under Rule 12(b)(6) for failure to state a claim upon which relief
 17 can be granted.
 18

19 ARGUMENT

20 I. THIS PROCEEDING SHOULD BE TRANSFERRED TO NEW YORK 21 PURSUANT TO 28 U.S.C. § 1404(a) AND THE FIRST-TO-FILE RULE

22 A. This Proceeding Should Be Transferred To New York Pursuant To 28 23 U.S.C. § 1404(a)

24 As this court is undoubtedly aware, pursuant to 28 U.S.C. § 1404(a), "[f]or the
 25 convenience of parties and witnesses, in the interest of justice, a district court may
 26 transfer any civil action to any other district or division where it might have been

brought.” Moreover, the decision to transfer is committed to the court’s discretion and is made according to an “individualized, case-by-case consideration of convenience and fairness.” *Forever Living Prods. U.S. Inc. v. Geyman*, 471 F. Supp. 2d 980, 983 (D. Ariz. 2006) (quoting *Stewart Org., Inc. v. Ricoh Corp.*, 487 U.S. 22, 29 (1988)).

Section 1404(a) imposes two conditions for transfer: (1) that the suit might have been brought in the transferee district; and (2) that the transfer is for the convenience of the parties and witnesses and is in the interest of justice. 28 U.S.C. § 1404(a); see *Van Dusen v. Barrack*, 376 U.S. 612, 616, 625-26 (1964); *Amazon.com v. Cendant Corp.*, 404 F. Supp. 2d 1256, 1259 (W.D. Wash. 2005). These conditions are easily satisfied here.⁵

1. Plaintiffs Might Have Brought This Proceeding In New York

Although not expressly stated in their Complaint, Plaintiffs presumably filed suit in the District of Arizona in accordance with the mutual jurisdiction provision of the Uniform Domain Dispute Resolution Policy (“UDRP”) in connection with the WIPO proceeding discussed above.⁶ However, this suit could have been filed in the Southern

⁵ As the moving party, SBM carries the burden of establishing that these requirements have been met. *Chodock v. Am. Econ. Ins. Co.*, No. Civ.-05-1263-PHXROS, 2005 WL 2994451, at *1 (D. Ariz. Nov. 7, 2005).

⁶ As required by Paragraph 3(b)(xiii) of the Rules for the UDRP, SBM stated that it would submit “to the jurisdiction of the courts of the United States of America, where the Registrar is located” with respect to any challenges raised by Toh and Wright following the Administrative Panel’s decision to transfer or cancel the Monaco Domain Names. (Lambert Decl., Ex. B, at 27, ¶ VIII.) Although Toh’s and Wright’s Registrar is located in Scottsdale, Arizona, (Complaint ¶¶ 6, 10), Plaintiffs are not precluded from challenging the WIPO decision in a jurisdiction other than Arizona. See *Storey v. Cello Holdings, L.L.C.*, 347 F.3d 370, 380 (2d Cir. 2003) (domain name registrant only required to file suit in mutual jurisdiction to which

1 District of New York. Based on SBM's activities within the State of New York
 2 (Lambert Decl. ¶¶3-4), the Southern District of New York has personal jurisdiction over
 3 SBM and is a proper venue. 28 U.S.C. §§ 1391(b)-(c); C.P.L.R. § 302. Because the
 4 New York Action brought by SBM was already underway, Plaintiffs obviously knew
 5 they could have brought a counterclaim there. The Southern District of New York
 6 would unquestionably have subject matter jurisdiction, as all federal courts have subject
 7 matter jurisdiction over cases arising under the Lanham Act. 28 U.S.C. § 1338
 8 (conferring federal question jurisdiction pursuant to 28 U.S.C. § 1331 to actions brought
 9 under the Lanham Act); *see Storey*, 347 F.3d at 379; *Hawes v. Network Solutions, Inc.*,
 10 337 F.3d 377, 382-83 (4th Cir. 2003). Accordingly, the action clearly could have been
 11 brought in the Southern District of New York. *See, e.g., Have A Nice Life, Inc. v. Home*
 12 *Box Office, Inc.*, No. C06-0601RSL, 2006 WL 1719923, at *1 n.1 (W.D. Wash. June 16,
 13 2006) (transferring suit filed in under UDRP's jurisdictional provision because
 14 transferee court had personal and subject matter jurisdiction); *Chodock*, 2005 WL
 15 2994451, at *2 (same).

19 2. Transfer To New York Is Convenient To The Parties And 20 Witnesses And In The Interest Of Justice

21 The relevant factors weigh in favor of transfer to New York. *See, e.g., Forever*
 22 *Living Prods.*, 471 F. Supp. at 983 (listing factors considered on motion to transfer).

23
 24 complainant had submitted if it wishes to delay implementation of UDRP panel's
 25 decision); UDRP, Paragraph 4k, *available at* <http://www.icann.org/udrp/udrp-policy-24oct99.htm> ("The mandatory administrative proceeding requirements set forth in
 26 Paragraph 4 shall not prevent either you or the complainant from submitting the
 dispute to a court of competent jurisdiction for independent resolution before such
 mandatory administrative proceeding is commenced or after such proceeding is
 concluded.").

a. *New York Is The More Convenient Forum*

New York is the more convenient forum for all parties and witnesses, access to sources of proof, and costs of litigation. As none of the parties are located within the U.S., none will be inconvenienced by a transfer to New York. In fact, New York is more convenient to all parties in terms of travel and time differences. *See Have A Nice Life*, 2006 WL 1719923, at *1 (factoring time zone and ease of travel into convenience analysis). The availability and frequency of international flights into New York City-area airports, coupled with shorter flight time, makes New York a more accessible forum, not to mention less costly to reach. (Lambert Decl. ¶ 12.) The shorter time differences between Europe, the United Arab Emirates, and New York, as compared to Arizona, will facilitate conferences with counsel and the court, as well as personal appearances by all parties. (*Id.* ¶13.)

In addition, evidence relating to SBM's use, promotion, and advertising of its trademarks in the U.S. is located in New York. (*Id.* ¶ 14.) Transporting documentary evidence to Arizona will undoubtedly prove more burdensome, inconvenient, and costly to SBM than producing such materials in New York. *See Berry v. Potter*, No. CIV 04-2922 PHX RCB, 2006 WL 335841, *6 (D. Ariz. Feb. 10, 2006) (fact that location of documentary evidence was closer to Northern District of Ohio favored transfer). Finally, little (if any) of Plaintiffs' documentary evidence is located in Arizona. Given that Plaintiffs must transport their evidence overseas, the transport of such evidence to New York will be more convenient as compared to Arizona based on shorter travel and shipping distance.

b. *There Is Virtually No Connection Between The Parties Or Any Of The Causes Of Action And This Forum*

Apart from the mutual jurisdiction provision of the UDRP, there is no connection between Arizona and any of the parties or claims in this action. *See Have A Nice Life*, 2006 WL 1719923, at *1 (noting mutual jurisdiction provision of UDRP provided only connection to forum where no parties, witnesses, or documentary evidence located within forum). Other than providing the address of its domain name registrar—which is entirely irrelevant to the convenience analysis, as GoDaddy.com Inc. is not a party to this action—Plaintiffs' Complaint does not contain a single fact or allegation to establish a connection between the parties or the causes of action alleged in the Complaint and Arizona.

In contrast, there is a connection between the parties and New York. Through its New York office, SBM promotes its casinos to consumers throughout the U.S. by participating in trade shows, advertising through the print and broadcast media, charity partnerships and participation, direct mail and telephone marketing, and sales to groups and individuals. (Lambert Decl. ¶ 4.) SBM also mails hundreds of promotional brochures from its New York office to U.S. clients each year. (*Id.*) Moreover, Plaintiffs have employed promotional campaigns targeting New York consumers. (SBM Amended Complaint ¶ 39.)

The lack of a connection between any of the parties or Plaintiffs' claims and this forum favors transfer.

1 c. *Plaintiffs' Choice Of Forum Does Not Warrant Deference*

2 Plaintiffs are not entitled to deference for their choice of forum, as SBM is the
 3 natural Plaintiff in this dispute. Indeed, Plaintiffs now seek declaratory judgment in an
 4 effort to overturn the adverse decision in the WIPO proceeding filed by SBM. Rather
 5 than raising the claims asserted herein in response to SBM's Amended Complaint—as
 6 Plaintiffs are required to do in less than one week—Plaintiffs have instead opted to
 7 initiate their own proceeding before this Court. A tactical decision such as this does not
 8 entitle PlayShare, Wright, and Toh to enjoy the choice of forum generally afforded to
 9 plaintiffs. Even if Plaintiffs were afforded deference, Plaintiffs' choice of forum should
 10 not preclude transfer to New York where, as here, “the interests of justice and fairness
 11 so clearly require otherwise.” *Forever Living Prods.*, 471 F. Supp. 2d at 985; *see also*
 12 *Berry*, 2006 WL 335841, at *4 (finding conveniences warranted transfer,
 13 notwithstanding deference afforded to plaintiff's choice of forum); *Forever Living*
 14 *Prods.*, 471 F. Supp. 2d at 985 (“The preference for honoring a Plaintiff's choice of
 15 forum is simply that—a preference. It is not a right.”); *Chodock*, 2005 WL 2994451, at
 16 *3 (“[L]ess deference [is given] to plaintiff's chosen venue when the plaintiff does not
 17 reside in the forum state or where the forum lacks a ‘significant connection’ to the
 18 activities alleged in the complaint.”).

23 d. *Transferring This Proceeding To New York Is In The*
 24 *Interest Of Justice And Judicial Efficiency*

25 The pendency of a related action in the transferee forum is a significant, if not
 26 determinative, factor in evaluating the interest of justice. *Advanced Semiconductor*
Materials Am. Inc. v. Applied Materials Inc., 30 U.S.P.Q.2d 1553, 1554 (D. Ariz. 1993)

1 (“As a general rule, cases should be transferred to districts where related actions are
 2 pending.”) (internal quotations omitted). By filing their Complaint in the District of
 3 Arizona, Plaintiffs essentially have asked this Court to hear a case that is already
 4 pending in the Southern District of New York, which is precisely the scenario that 28
 5 U.S.C. § 1404(a) was designed to avoid. *Van Dusen*, 376 U.S. at 616.

6 Transferring this proceeding to New York promotes judicial efficiency and
 7 prevents the risk of inconsistent outcomes. Duplicative evidentiary and judicial
 8 processes—in addition to increased costs to both the parties and the courts—will
 9 undoubtedly ensue should both actions proceed concurrently in different districts. *Have*
 10 *A Nice Life*, 2006 WL 1719923, at *2 (concluding transfer was “the only means by
 11 which to avoid the duplication of evidentiary and judicial processes and to reduce
 12 corresponding financial burdens on the public courts and the parties”); *Jolly v. Purdue*
 13 *Pharma L.P.*, No. 05-CV-1452H, 2005 WL 2439197, at *3 (S.D. Cal. Sept. 28, 2005)
 14 (same).
 15

16
 17 In sum, the relevant factors favor transfer of this proceeding pursuant to 28
 18 U.S.C. § 1404(a).
 19

20 B. This Court Should Defer To The District Court Of The Southern District
Of New York Under The First-To-File Rule

21 Independent of the § 1404(a) standard, SBM’s motion to transfer should also be
 22 granted under the first-to-file rule. In determining whether to apply the first-to-file rule,
 23 three threshold factors are considered: “(1) chronology of the two actions; (2) the
 24 similarity of the parties; and (3) the similarity of the issues.” *Best Western*, 2007 WL
 25 1302749, at *1 (internal quotations omitted); *see also Pacesetter Sys., Inc. v. Medtronic*,
 26

1 *Inc.*, 678 F.2d 93, 95 (9th Cir. 1982) (party may invoke first-to-file rule “when a
 2 complaint involving the same parties and issues has already been filed in another
 3 district”); *Alltrade, Inc. v. Uniweld Prods., Inc.*, 946 F.2d 622, 625 (9th Cir. 1991)
 4 (same).
 5

6 Here, the prerequisites for applying the first-to-file rule are plainly met. SBM
 7 filed the New York Action weeks before the filing of this action. Additionally, the
 8 parties are highly similar. The fact that SBM has named three additional parties as
 9 defendants in the New York Action—all of which are believed to be subsidiaries of
 10 PlayShare and involved in the infringing activities addressed in SBM’s Amended
 11 Complaint—does not change the outcome. *See Best Western*, 2007 WL 1302749, at *2
 12 n.1 (finding that “litigations need only be substantially similar and not exactly identical”
 13 for purposes of the first-to-file rule and holding that addition of four individual
 14 defendants to second action did not change similarity); *Am. Guarantee & Liab. Ins. Co.*
 15 *v. U.S. Fid. & Guar. Co.*, No. C06-1254RSM, 2006 WL 3499342, at *2 (W.D. Wash.
 16 Dec. 4, 2006) (slip copy) (addition of defendant to second filed action did not prevent
 17 parties from being similar under first-to-file rule).
 18
 19
 20

21 Finally, the New York and Arizona Complaints address not just similar but
 22 virtually identical issues. (See Complaint ¶¶18, 23, 29; SBM Amended Complaint ¶
 23 13.) “Where, as here, a reactive lawsuit presents substantially the same controversy as
 24 the previously filed case, the first-to-file rule demands that the case be litigated in [New
 25 York], not [Arizona].” *Klein v. Gardner*, No. C 06-06918 CRB, 2007 WL 128228, *4
 26

1 (N.D. Cal. Jan. 12, 2007) (slip copy) (citing *Pacesetter*, 678 F.2d at 94-96).

2 **II. IN THE ALTERNATIVE, THE COURT SHOULD DISMISS COUNTS II**
 3 **AND III OF THE COMPLAINT**

4 **A. The Court Should Dismiss Counts II And III Of The Complaint Pursuant**
 5 **To Rule 12(b)(2) Based On Plaintiffs' Failure To Establish Personal**
 6 **Jurisdiction Over SBM**

7 Plaintiffs bear the burden of establishing personal jurisdiction over SBM.
 8 *Mattel, Inc. v. Grenier & Hausser GmbH*, 354 F.3d 857, 862 (9th Cir. 2003). As
 9 discussed *supra*, Plaintiffs presumably filed suit in the District Court of Arizona
 10 pursuant to the mutual jurisdiction provision in the UDRP.⁷ However, SBM's
 11 submission to the jurisdiction of the courts of the United States was "with respect to any
 12 challenges to a decision in the administrative proceeding canceling or transferring the
 13 domain name" (Lambert Decl., Ex. B, at 27, ¶ VIII), and thus only extends to Plaintiffs'
 14 claim brought under the Anticybersquatting Consumer Protection Act ("ACPA").⁸ *See*,
 15 *e.g.*, *Storey*, 347 F.3d at 383 (noting adverse UDRP decision triggers domain name
 16 holder's right to file suit pursuant to ACPA, 15 U.S.C. § 1114(2)(D)(v)). Because
 17 Counts II and III are beyond the scope of the mutual jurisdiction provision and Plaintiffs
 18 have failed to establish personal jurisdiction over SBM with respect to either count, both
 19 should be dismissed pursuant to Rule 12(b)(2). *See Virtuality L.L.C. v. Bata Ltd.*, 138 F.

22
 23 ⁷ Other than a passing reference to Paragraph 4(k) of the UDRP (Complaint ¶
 24 1), the Complaint, on its face, does not allege a single fact sufficient for establishing
 25 personal jurisdiction over SBM for any of the causes of action asserted therein.

26 ⁸ Moreover, Plaintiffs conveniently overlook the fact that PlayShare was not a
 party to the WIPO proceeding. Therefore, SBM's consent to submit to the
 jurisdiction of the U.S. courts for the purpose of challenging the WIPO decision
 applies only to Toh and Wright. *Virtuality*, 138 F. Supp. 2d at 683 (dismissing
 plaintiff not party to WIPO proceeding).

1 Supp. 2d 677, 685 (D. Md. 2001) (“[Defendant’s] consent to jurisdiction [for the limited
2 purpose of reviewing a UDRP decision] related solely to the dispute between it and
3 [Plaintiff] as to the ownership of the domain names at issue.”).

4
5 B. The Court Should Dismiss Plaintiffs’ Claims That SBM’s Trademarks
6 Are Invalid Or Unenforceable

7 Despite Plaintiffs’ efforts to defeat the validity of SBM’s trademarks, none of the
8 grounds set forth in Counts II and III of the Complaint amount to a viable claim upon
9 which relief can be granted and thus should be dismissed pursuant to Fed. R. Civ. P.
10 12(b)(6).⁹

11 1. Plaintiffs’ Claim Of Invalidity And Unenforceability Of SBM’s
12 CASINO DE MONACO Registration Should Be Dismissed

13 On a motion to dismiss under Rule 12(b)(6), the allegations in the complaint
14 should be taken as true and are construed in the light most favorable to the complaining
15 party. *Adams v. Johnson*, 355 F.3d 1179, 1183 (9th Cir. 2004). “Dismissal is proper
16 under Rule 12(b)(6) if it appears beyond doubt that the non-movant can prove no set of
17 facts to support its claims.” *Id.*

18
19 Plaintiffs allege that SBM’s registration of its CASINO DE MONACO mark is
20 invalid based on fraudulent procurement.¹⁰ (Complaint ¶ 21(a), (g).) To properly plead
21 their claim, Plaintiffs must allege that SBM knowingly made false, material
22

23
24 ⁹ Although not specifically requested in the Complaint or prayer for relief,
25 Plaintiffs’ claim that SBM’s registration for CASINO DE MONACO is invalid or
unenforceable is tantamount to a claim for cancellation.

26 ¹⁰ Specifically, Plaintiffs allege: “The ‘006 Mark is invalid due to repeated fraud
on the United States Patent and Trademark Office (hereinafter “USPTO”) without
which the trademark registration would not have issued.” (Complaint ¶ 21(a).)

1 misrepresentations of fact in connection with the application to register the CASINO DE
2 MONACO mark. *See Omega S.A. v. Omega Eng'g, Inc.*, 396 F. Supp. 2d 166, 185 (D.
3 Conn. 2005). Plaintiffs make no assertion that SBM misrepresented any fact to the
4 USPTO, let alone a material fact that led to the issuance of the registration. Because
5 Plaintiffs' claim lacks any allegation of any of the elements of a viable fraud claim, the
6 claim fails as a matter of law and should consequently be dismissed pursuant to Rule
7 12(b)(6).
8
9

10 Moreover, Plaintiffs have altogether failed to plead their claim of fraud with
11 particularity as required by Rule 9(b). *See San Juan Prods., Inc. v. San Juan Pools,*
12 *Inc.*, 849 F.2d 468, 472 (10th Cir. 1998) ("fraud in the procurement must be alleged
13 with specificity as required by Rule 9(b), both in federal court and in PTO
14 administrative proceedings"). Rule 9(b) requires that "[i]n all averments of fraud or
15 mistake, the circumstances constituting fraud or mistake shall be stated *with*
16 *particularity.*" Fed. R. Civ. P. 9(b) (emphasis added). In order to satisfy the
17 particularity standard of Rule 9(b), a party must specifically identify the "time, place
18 and nature of the alleged fraudulent activities." *Moore v. Kayport Package Express,*
19 *Inc.*, 885 F.2d 531, 540 (9th Cir. 1989). Plaintiffs' bare, generalized, and conclusory
20 claim does not even come close to satisfying the heightened requirements of Rule 9(b)
21 and should therefore be dismissed.¹¹
22
23
24

25 _____
26 ¹¹ None of Plaintiffs' remaining grounds for declaring SBM's registration
invalid and unenforceable constitute a viable claim and thus should be dismissed
under Rule 12(b)(6). Because Plaintiffs' claim of misuse hinges upon fraud, this

2. Plaintiffs' Claim Of Unenforceability Of SBM's CASINO DE MONTE-CARLO Mark Should Be Dismissed

Plaintiffs' claim ignores both the plain language of the Lanham Act and settled case law establishing that SBM does in fact use its CASINO DE MONTE-CARLO mark in U.S. commerce. (Complaint ¶ 25.) *Int'l Bancorp, LLC. v. Société des Bains de Mer et du Cercle des Etrangers à Monaco*, 329 F.3d 359, 370 (4th Cir. 2003) (holding SBM's use of CASINO DE MONTE-CARLO mark satisfies Lanham Act's "use in commerce" requirement); cf. *Pachmayr Gun Works, Inc. v. Olin Mathieson Chem. Corp. Winchester Western Div.*, 502 F.2d 802, 805-06 (9th Cir. 1974) (applying principle of stare decisis to prior finding of trademark validity), *superseded by statute*, Act of Jan. 2, 1975, Pub. L. No. 93-600, § 3, 88 Stat. 1955, 15 U.S.C. § 1117. Accordingly, Plaintiffs' claim fails to state a claim upon which relief can be granted and should be dismissed under Rule 12(b)(6).

CONCLUSION

Based on the foregoing, SBM respectfully requests that this Court transfer this proceeding to New York. In the alternative, SBM respectfully requests that its motion to dismiss is granted.

claim fails as a matter of law as well. (Complaint ¶ 21(b).) Further, Plaintiffs fail to plead how lack of a disclaimer invalidates SBM's registration or this Court's jurisdiction over such a claim. (Complaint ¶ 21(c).) *Top Producer Sys. Inc. v. Software Scis. Ltd.*, No. 97-0415, 1997 WL 723049, at *3 (D. Or. July 21, 1997) (holding court "lack[ed] jurisdiction to enter a disclaimer or to cancel a mark based upon failure to disclaim"). Finally, Plaintiffs' claim that SBM has not used the mark in commerce—which is essentially a claim for abandonment—is premature, as SBM is only required to use the mark in commerce within three years from the date of registration. (Complaint ¶ 21(d), (g).) 15 U.S.C. §§ 1126, 1127; *see also Imperial Tobacco Ltd. v. Philip Morris, Inc.*, 899 F.2d 1575, 1582 (Fed. Cir. 1990).

1 Dated this 18th day of July, 2007.

2
3 JENNINGS, STROUSS & SALMON, P.L.C.

4
5 By 

6 John C. West
7 The Collier Center, 11th Floor
8 201 East Washington Street
9 Phoenix, Arizona 85004-2385
10 Attorneys for Defendant

11
12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on July 18 2007, I electronically transmitted the attached
14 document to the Clerk's office using the CM/ECF System for filing and transmittal
15 of a notice of Electronic Filing to the following CM/ECF registrants:

16 Cynthia Dawn Beck
17 Schmeiser, Olsen & Watts LLP
18 18 E. University Dr., Ste. 101
19 Mesa, AZ 85201
20 Attorney for Plaintiffs
21 cbeck@iplawusa.com

22
23
24
25
26 By 

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

-----X
PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.
-----X

Case No. 2:07-cv-01203-PGR

DECLARATION OF BERNARD LAMBERT

I, Bernard Lambert, declare as follows:

1. I am the Chief Executive Manager of Société des Bains de Mer et du Cercle des Etrangers à Monaco ("SBM"). I have been employed at SBM since February 2002. Prior to joining SBM, I had thirty-three years of experience in the hotel and resort industry. I make this declaration in support of SBM's Motion to Transfer Or, In The Alternative, To Dismiss. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could competently testify to these facts.

2. SBM is a société anonyme organized and existing under the laws of the Principauté of Monaco. It is the founder and manager of five Monaco casinos, including the Casino de Monte-Carlo, which has been in operation since April 2, 1863. Under express decree from the authorities of the Principauté of Monaco, SBM enjoys a monopoly for casino and gaming industries within the territory of the Principauté of Monaco and is therefore the sole company that can organize games and gambling in Monaco.

3. SBM actively promotes its five Monaco-based casinos, particularly the Casino de Monte-Carlo, throughout the world and in the United States. Many of these marketing and promotional activities are conducted out of, coordinated by, or documented by records maintained in SBM's New York office, which is operated in conjunction with the Principauté de Monaco, located at 565 Fifth Avenue, New York, New York 10017. SBM has maintained this New York office in conjunction with the Monaco tourism office for more than twenty years, and has done so for the purposes of promoting and advertising SBM's Monaco-based casinos. SBM also uses its New York office as an international sales office from which consumers are able to book reservations for travel to Monaco and make arrangements for use of SBM's Monaco casinos.

4. Through its New York office, SBM promotes its casinos in the United States by participating in trade shows, arranging for advertising through the print and broadcast media, charity partnerships and participation, direct mail and telephone marketing, and generating sales to groups and individuals. In addition to the thousands of brochures sent from SBM's Monaco office, hundreds of brochures advertising SBM's Monaco-based casinos are mailed to clients throughout the United States from SBM's New York office every year. SBM also distributes brochures throughout the United States through third-party agents. Further, SBM publishes and distributes its quarterly publication, Monte Carlo Society, to clients in the United States.

5. SBM owns United States Trademark Registration No. 3,031,006, registered December 20, 2005, for the CASINO DE MONACO mark in connection with casino-related goods and services. A true and correct copy of Registration No. 3,031,006 is attached hereto as Exhibit A. SBM's trademark application for the mark CASINO DE MONTE-CARLO, Serial No. 76/479,351, was filed on December 30, 2002 and is currently pending in the United States

Patent & Trademark Office. SBM also owns over one hundred and fifty domain names incorporating its trademarks that it uses in connection with its gaming and casino-related goods and services, including, among others, <monaco-grand-casino.com>, <casinosdemonaco.com>, <livemonacocasino.com>, <monacogoldcasino.fr>, <monaco-casinos.com>, <monaco-casinos.net>, <monacobestcasino.com>, <casinosmonaco.com>, <casinomonacopoker.com>, <casinomontecarlo.com>, and <casino-monte-carlo.com>. SBM uses these domain names and others to promote its Monaco casinos.

6. As a result of SBM's extensive advertising and promotion of its Monaco-based casinos, the terms "Monaco" and "Monte Carlo," when used in connection with casino-related services and products, embody the tremendous value and goodwill of SBM. SBM will be irreparably harmed if it loses its ability to prevent unauthorized gaming services, such as online casinos, from using the terms "Monaco" and "Monte Carlo" in connection with casino-related services and products.

7. On March 21, 2007, SBM initiated a proceeding with the World Intellectual Property Organization ("WIPO") for the transfer of more than sixty domain names incorporating the terms "Monaco Casino" and "Monaco" (the "Monaco Domain Names") used in connection with online gambling services. That proceeding was initiated against, and actively litigated by, Lucan Toh ("Toh") and Maxwell Wright ("Wright"), the registered owners of the Monaco Domain Names. The Monaco Domain Names are used in connection with PlayShare PLC's ("PlayShare") Grand Monaco Casino, an online casino. A true and correct copy of SBM's complaint in the WIPO proceeding is attached hereto as Exhibit B.

8. On June 6, 2007, before any WIPO decision was rendered, SBM filed suit in the United States District Court for the Southern District of New York (the "New York Action")

against PlayShare, Toh, Wright, and various PlayShare subsidiaries and affiliates (collectively, the "New York Action Defendants") for unfair competition, trademark infringement, cybersquatting, trademark dilution, and other related claims. The following day, on June 7, 2007, SBM filed an Amended Complaint to clarify the corporate name of one of the New York Action Defendants, GamShare (UK) Limited. A true and correct copy of SBM's Amended Complaint in the New York Action is attached hereto as Exhibit C. In addition to the New York Action, SBM has filed proceedings against PlayShare, Toh, and Wright in the United Kingdom, and France.

9. On June 11, 2007, SBM received notice of a decision from WIPO ordering that the Monaco Domain Names be transferred to SBM. A true and correct copy of that decision, along with WIPO's June 11, 2007 transmission memorandum, is attached hereto as Exhibit D. Following the issuance of that order, notwithstanding the pendency of the New York Action, PlayShare, Toh, and Wright (collectively, "Plaintiffs") filed suit against SBM in the District Court of Arizona, seeking declaratory judgment that their use of the Monaco Domain Names does not violate the Anticybersquatting Consumer Protection Act nor infringe upon SBM's trademarks.

10. Although SBM has actively promoted its Monaco-based casinos throughout North America, it has not systematically targeted its websites, its mailings, or other marketing materials to Arizona. SBM has no offices in Arizona, owns no property in Arizona, and does not systematically conduct business in Arizona.

11. Because a SBM office and SBM personnel are located in New York City, SBM believes that New York City is the most mutually convenient venue for resolution of this dispute.

12. Notwithstanding that the parties to the instant dispute are located mainly in Europe or in the United Arab Emirates, this is undoubtedly a matter for resolution by a United States federal court, as United States trademark law governs the outcome. Witnesses and parties traveling to the United States from Europe or from the United Arab Emirates can travel more easily to New York City than to Phoenix, Arizona. The multiple international airports in New York City provide a greater number of flight options, resulting in less expensive flights and additional arrival and departure times for European visitors. As New York City is also closer to Europe, the duration of flights will be reduced for all parties to this dispute. Moreover, because SBM's New York City office is the only United States office maintained by any party to this dispute, New York City is the only venue in which any party witnesses could appear without traveling by air.

13. Adjudication in New York City would reduce the time zone difference between the court and all parties, including Plaintiffs. This would allow for easier coordination of telephone conferences between the court, counsel, and the parties. It would also facilitate meet-and-confer sessions between the parties and their United States counsel.

14. Any documents in SBM's custody or control that are relevant to the claims in this suit likely are located in SBM's New York City office or in SBM's offices in Monaco. Accordingly adjudication in New York City offers an evidentiary efficiency not present in any other United States venue.

15. Finally, SBM believes that adjudication of these claims in New York City would prevent the undue hardships associated with parallel litigation of similar claims. Since June 6, 2007, SBM has been litigating related claims against the New York Action Defendants in the United States District Court for the Southern District of New York. SBM's Amended Complaint

in that action includes claims related to those at issue in this declaratory judgment proceeding, including claims for trademark infringement and for cybersquatting. (SBM's Amended Complaint also contains claims that are broader than those contained in this declaratory judgment proceeding, including claims for unfair competition under New York law, for false advertising under New York law, and for trademark dilution under New York law.) SBM believes that transfer of the instant declaratory judgment dispute to New York City, and the subsequent consolidation of the pending cases, would prevent the unnecessary expense of litigating certain identical issues simultaneously in two different forums.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: July 17, 2007

A handwritten signature in black ink, appearing to read "Bernard Lambert", written over a horizontal line.

Bernard Lambert

Exhibit A

Int. Cls.: 9, 16, 28 and 41

Prior U.S. Cls.: 2, 5, 21, 22, 23, 26, 29, 36, 37, 38, 50,
100, 101 and 107

Reg. No. 3,031,006

Registered Dec. 20, 2005

United States Patent and Trademark Office

**TRADEMARK
SERVICE MARK
PRINCIPAL REGISTER**

CASINO DE MONACO

SOCIETE ANONYME DES BAINS DE MER ET
DU CERCLE DES ETRANGERS A MONACO
(MONACO COMPANY)
PLACE DU CASINO
MC 9800 MONTE CARLO, MONACO

FOR: ELECTRIC APPARATUS AND INSTRUMENTS, NAMELY COMPUTERIZED VIDEO GAMES FOR GAMING PURPOSES, INTERACTIVE VIDEO GAMES OF VIRTUAL REALITY COMPRISED OF COMPUTER HARDWARE AND SOFTWARE, MACHINES FOR PLAYING GAMES OF CHANCE, COMPUTER SOFTWARE GAMES, SOFTWARE FOR USE IN GAMING MACHINES AND GAMING EQUIPMENT, GAMING EQUIPMENT NAMELY GAMING MACHINES, SLOT MACHINES, KENO AND POKER MACHINES, COIN CHANGERS, COIN ACCEPTERS FOR SEPARATING GOOD COINS FROM COUNTERFEITS; PHOTOGRAPHIC APPARATUS; CONTROLLING AND SIGNALING APPARATUS USED IN CASINOS; APPARATUS FOR RECORDING, TRANSMISSION, REPRODUCTION OF SOUND OR IMAGES, NAMELY RADIO APPARATUS, VIDEO SCREEN, VIDEO CAMERAS; CALCULATORS, DATA PROCESSING EQUIPMENT, NAMELY COMMUNICATION SERVERS, COMMUNICATION SOFTWARE FOR CONNECTING GLOBAL COMPUTER NETWORKS, COMPUTER CAMERAS, COMPUTER GAME SOFTWARE; COMPUTER ECOMMERCE SOFTWARE TO ALLOW USERS TO PERFORM ELECTRONIC BUSINESS TRANSACTIONS VIA A GLOBAL COMPUTER NETWORK AND COMPUTERS; FIRE EXTINGUISHERS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FOR: PRINTED MATTER, NAMELY BLANK OR PARTIALLY PRINTED POSTCARDS, PRINTED INVITATIONS, PRINTED MENUS, PRINTED PAPER SIGNS, MENU BOARDS, PRINTED TIMETABLES, BOOKS, MAGAZINES, CATALOGUES FEATURING CASINO, HOTEL AND INTERNATIONAL NEWS, TOURISM; BOOKBINDINGS; PHOTOGRAPHS,

STATIONERY; ADHESIVES TAPES FOR STATIONERY OR HOUSEHOLD PURPOSES; ARTISTS MATERIALS, NAMELY PENCILS, PENS, BRUSHES, PAINT BRUSHES; TYPEWRITERS AND OFFICE REQUISITES, NAMELY TYPEWRITER TYPING ELEMENTS, RUBBER BANDS, STAPLERS; PRINTED INSTRUCTIONAL, EDUCATIONAL, AND TEACHING MATERIALS USED IN HOTELS AND CASINOS FOR TEACHING DIFFERENT GAMES; PLASTIC MATERIALS FOR PACKAGING, NAMELY BAGS FOR PACKAGING, TUBS FOR CONSUMER PRODUCTS, PLASTIC FILMS USED AS PACKAGING FOR FOOD, ENVELOPES, POUCHES FOR MERCHANDISE PACKAGING; PRINTERS' TYPE; PRINTING BLOCKS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FOR: GAMES AND PLAYTHINGS, NAMELY PLAYING CARDS, BOARD GAMES, CARD GAMES, COIN-OPERATED VIDEO GAMES, DISPOSABLE TICKET SETS FOR PLAYING GAMES OF CHANCE, HAND HELD UNITS FOR PLAYING ELECTRONIC AND VIDEO GAMES, LOTTERY GAMES, DOMINOS, PARLOR GAMES, EUROPEAN ROULETTE, AMERICAN ROULETTE, VIDEO POKER, POKER GAME AND BOULE GAME; GYMNASTIC AND SPORTING ARTICLES, NAMELY GOLF BAGS AND BALLS, SPORT BALLS, PLAY SWIMMING POOLS, SWIMMING EQUIPMENT, GYMNASTIC APPARATUS, GYMNASTIC TRAINING STOOLS, PORTABLE SUPPORT STRETCHING FOR DANCE AND OTHER EXERCISES AND TENNIS EQUIPMENT; DECORATION FOR CHRISTMAS TREES, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FOR: ORGANIZING COMMUNITY SPORTING AND CULTURAL ACTIVITIES; PROVIDING CASINO SERVICES WITHIN A HOTEL RESORT ENVIRONMENT; TRAINING FOR THE PERSONNEL EMPLOYED IN CASINOS IN THE USE AND OPERATION OF SLOT MACHINES AND CINEMA EQUIPMENT; CONDUCTING EDUCATIONAL EN-

ENTERTAINMENT EXHIBITS IN THE NATURE OF COOKING DEMONSTRATIONS; ENTERTAINMENT SERVICES IN THE NATURE OF OPERA, NAMELY, ORGANIZING, PRODUCING AND PRESENTING LIVE MUSICAL, ORCHESTRAL AND OPERATIVE SHOWS; ORGANIZING SPORTING EVENTS IN THE NATURE OF CAR RACING, TENNIS TOURNAMENTS, GOLF TOURNAMENTS, AND SWIMMING COMPETITIONS, IN CLASS 41 (U.S. CLS. 108, 101 AND 107).

PRIORITY CLAIMED UNDER SEC. 44(D) ON MONACO APPLICATION NO. 29610, FILED 7-1-2002, REG. NO. 0223234, DATED 9-30-2002, EXPIRES 7-1-2012.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE CASINO, APART FROM THE MARK AS SHOWN.

THE ENGLISH TRANSLATION OF CASINO DE MONACO IS CASINO OF MONACO.

SEC. 2(F).

SER. NO. 76-478,796, FILED 12-24-2002.

ALICE BENMAMAN, EXAMINING ATTORNEY

Exhibit B-1

COMPLAINT TRANSMITTAL COVERSHEET

Attached is a Complaint that has been filed against you with the World Intellectual Property Organization (WIPO) Arbitration and Mediation Center (the **Center**) pursuant to the Uniform Domain Name Dispute Resolution Policy (the **Policy**) approved by the Internet Corporation for Assigned Names and Numbers (ICANN) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the **Rules**), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the **Supplemental Rules**).

The Policy is incorporated by reference into your Registration Agreement with the Registrar(s) of your domain name(s), in accordance with which you are required to submit to a mandatory administrative proceeding in the event that a third party (a **Complainant**) submits a complaint to a dispute resolution service provider, such as the Center, concerning a domain name that you have registered. You will find the name and contact details of the Complainant, as well as the domain name(s) that is/are the subject of the Complaint in the document that accompanies this Coversheet.

You have no duty to act at this time. Once the Center has checked the Complaint to determine that it satisfies the formal requirements of the Policy, the Rules and the Supplemental Rules, it will forward an official copy of the Complaint to you. You will then have 20-calendar days within which to submit a Response to the Complaint in accordance with the Rules and Supplemental Rules to the Center and the Complainant. You may represent yourself or seek the assistance of legal counsel to represent you in the administrative proceeding.

- The **Policy** can be found at <http://arbiter.wipo.int/domains/rules/>
- The **Rules** can be found at <http://arbiter.wipo.int/domains/rules/>
- The **Supplemental Rules**, as well as other information concerning the resolution of domain name disputes can be found at <http://arbiter.wipo.int/domains/rules/>
- A **model Response** can be found at <http://arbiter.wipo.int/domains/respondent/index.html>

Alternatively, you may contact the Center to obtain any of the above documents. The Center can be contacted in Geneva, Switzerland by telephone at +41 22 338 8247, by fax at +41 22 740 3700 or by e-mail at domain.disputes@wipo.int.

You are kindly requested to contact the Center to provide the contact details to which you would like (a) the official version of the Complaint and (b) other communications in the administrative proceeding to be sent.

A copy of this Complaint has also been sent to the Registrar(s) with which the domain name(s) that is/are the subject of the Complaint is/are registered.

By submitting this Complaint to the Center the Complainant hereby agrees to abide and be bound by the provisions of the Policy, Rules and Supplemental Rules.

Before the:

**WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER**

**La Société des Bains de Mer et du
cercle des étrangers à Monaco,
Place du Casino, Monte Carlo, MC
98000 Monaco, Principauté de Monaco**

(Complainant)

-v-

**Lucan Toh and Max Wright
46 Berkeley Square
London, London W1J 5AT
United Kingdom**

(Respondents)

Disputed Domain Names:

**grandmonaco.com
casinograndmonaco.com
grandmonacocasino.com
deutschesgrandmonaco.com
grandmonacoayda.com
grandmonacoayuda.com
grandmonacobingo.com
grand-monaco.com
grand-monaco-casino.com
grand-monaco-poker.com
grandmonacocasinoclub.com
grandmonacoclub.com
grandmonacocraps.com
grandmonacogames.com
grandmonacogaming.com
grandmonacohost.com
grandmonacohosts.com
grandmonacolottery.com
grandmonacolotto.com
grandmonacolounge.com
grandmonacomahjong.com
grandmonacomillions.com
grandmonaconews.com
grandmonaconlinecasino.com
grandmonaconlinegaming.com
grandmonaconlinepoker.com
grandmonacopartners.com
grandmonacoplayersclub.com
grandmonacopoker.com**

grandmonacopokerclub.com
grandmonacopromotions.com
grandmonacoracebook.com
grandmonacorewards.com
grandmonacoskillgames.com
grandmonacoslots.com
grandmonacosports.com
grandmonacosportsbook.com
grandmonacostore.com
grandmonacosupport.com
grandmonacovideopoker.com
grandmonaco.net
casinograndmonaco.net
grandmonacobingo.net
grandmonacocasino.net
grandmonacocasinoclub.net
grandmonacogames.net
grandmonacogaming.net
grandmonacolottery.net
grandmonacomillions.net
grandmonacoplayersclub.net
grandmonacopoker.net
grandmonacopokerclub.net
grandmonacoracebook.net
grandmonacoskillgames.net
grandmonacosports.net
grandmonacosportsbook.net
pokergrandmonaco.net
grandmonaco.org
casinograndmonaco.org
grandmonacocasino.org
grandmonacocasinoclub.org
grandmonacomillions.org
grandmonacopoker.org
grandmonacopokerclub.org
grandmonacoracebook.org
pokergrandmonaco.org

AMENDED COMPLAINT

(Rules, para. 3(b))

I. Introduction

[1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (the **Policy**), approved by the Internet Corporation for Assigned Names and Numbers (**ICANN**) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the **Rules**), approved by ICANN on October 24, 1999 and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the **Supplemental Rules**).

II. The Parties

A. The Complainant

(Rules, para. 3(b)(ii) and (iii))

[2.] The Complainant in this administrative proceeding is:

Société des Bains de Mer et du Cercle des Étrangers à Monaco, a limited liability company enrolled with the registry of companies of Monaco under number 56 S 00523, represented by its legal representatives,

As referred hereunder as the **Société des Bains de Mer** or **SBM**.

[3.] The Complainant's contact details are:

Address: Place du Casino, Monte Carlo, MC 98000 Monaco,
Principauté de Monaco.
Telephone: +377 92 16 20 00
Fax: +377 92 16 38 93

[4.] The Complainant's authorized representative in this administrative proceeding is:

Representative: De Gaulle Fleurance & Associés
Address: 11, rue Portalis
75008 Paris
France
Telephone: +33 1 56 64 00 00
Fax: +33 1 56 64 00 01
E-mail: jhorn@dgfla.com

[5.] The Complainant's preferred method of communications directed to the Complainant in this administrative proceeding is:

Electronic-only material

Method: e-mail
Address: jhorn@dgfla.com

Contact: Maître Julien Horn

Material including hardcopy

Method: post
Address: De Gaulle Fleurance & Associés
11, rue Portalis
75008 Paris
France

Contact: Maître Julien Horn

B. The Respondent

(Rules, para. 3(b)(v))

[6.] The disputed domain names are registered to **Lucan Toh or Max Wright** as shown in the Registrar's WhoIs database as shown in the printouts provided in Annex [A].

[7.] All information known to the Complainant regarding how to contact the Respondents is as follows:

Address: **Lucan Toh and Max Wright**
46, Berkeley Square
London, London W1J 5AT
United Kingdom

Telephone: +44-20- 7598- 4064

Email: calan.horsman@playshare.com

III. The Domain Names and Registrar

(Rules, para. 3(b)(vi) and (vii))

[8.] This dispute concerns the domain names identified below:

GRANDMONACO.COM
CASINOGRANDMONACO.COM
GRANDMONACOCASINO.COM
DEUTSCHESGRANDMONACO.COM
GRANDMONACOAYDA.COM
GRANDMONACOAYUDA.COM
GRANDMONACOBINGO.COM
GRAND-MONACO.COM
GRAND-MONACO-CASINO.COM
GRAND-MONACO-POKER.COM
GRANDMONACOCASINOCLUB.COM
GRANDMONACOCLUB.COM
GRANDMONACOCRAPS.COM
GRANDMONACOGAMES.COM
GRANDMONACOGAMING.COM
GRANDMONACOHOST.COM
GRANDMONACOHOSTS.COM
GRANDMONACOLOTTERY.COM
GRANDMONACOLOTTO.COM
GRANDMONACOLOUNGE.COM
GRANDMONACOMAHJONG.COM
GRANDMONACOMILLIONS.COM
GRANDMONACONEWS.COM
GRANDMONACOONLINECASINO.COM
GRANDMONACOONLINEGAMING.COM
GRANDMONACOONLINEPOKER.COM
GRANDMONACOPARTNERS.COM
GRANDMONACOPLAYERSCLUB.COM
GRANDMONACOPOKER.COM
GRANDMONACOPOKERCLUB.COM
GRANDMONACOPROMOTIONS.COM
GRANDMONACORACEBOOK.COM
GRANDMONACOREWARDS.COM
GRANDMONACOSKILLGAMES.COM
GRANDMONACOSLOTS.COM
GRANDMONACOSPORTS.COM

GRANDMONACOSPORTSBOOK.COM
GRANDMONACOSTORE.COM
GRANDMONACOSUPPORT.COM
GRANDMONACOVIDEOPOKER.COM
GRANDMONACO.NET
CASINOGRANDMONACO.NET
GRANDMONACOBINGO.NET
GRANDMONACOCASINO.NET
GRANDMONACOCASINOCUB.NET
GRANDMONACOGAMES.NET
GRANDMONACOGAMING.NET
GRANDMONACOLOTTERY.NET
GRANDMONACOMILLIONS.NET
GRANDMONACOPLAYERSCLUB.NET
GRANDMONACOPOKER.NET
GRANDMONACOPOKERCLUB.NET
GRANDMONACORACEBOOK.NET
GRANDMONACOSKILLGAMES.NET
GRANDMONACOSPORTS.NET
GRANDMONACOSPORTSBOOK.NET
POKERGRANDMONACO.NET
GRANDMONACO.ORG
CASINOGRANDMONACO.ORG
GRANDMONACOCASINO.ORG
GRANDMONACOCASINOCUB.ORG
GRANDMONACOMILLIONS.ORG
GRANDMONACOPOKER.ORG
GRANDMONACOPOKERCLUB.ORG
GRANDMONACORACEBOOK.ORG
POKERGRANDMONACO.ORG

Copies of the printouts of the Whois searches are provided in Annex [A].

[9.] The registrar with whom all the domain names are registered is:

Name: Go Daddy Software Inc.

Address: 14455 N. Hayden Rd.
Suite 219
Scottsdale, AZ 85260
United States of America

Telephone: +1 480 505-8899
Fax: +1 480 505-8844
E-mail: abuse@godaddy.com

IV. Jurisdictional Basis for the Administrative Proceeding
(Rules, paras. 3(a), 3(b)(xv))

[10.] The dates on which the registration agreements of the disputed domain names were entered are detailed in the following table:

DOMAIN NAME	REGISTRATION AGREEMENT DATE
grandmonaco.com	October 23, 2004
casinograndmonaco.com	December 19, 2005
grandmonacocasino.com	June 23, 2005
deutschesgrandmonaco.com	August 3, 2006
grandmonacoayda.com	July 27, 2006
grandmonacoayuda.com	July 27, 2006
grandmonacobingo.com	January 3, 2006
grand-monaco.com	December 21, 2005
grand-monaco-casino.com	December 21, 2005
grand-monaco-poker.com	December 21, 2005
grandmonacocasinoclub.com	December 21, 2005
grandmonacoclub.com	January 3, 2006
grandmonacocraps.com	February 20, 2006
grandmonacogames.com	January 3, 2006
grandmonacogaming.com	February 20, 2006
grandmonacohost.com	April 13, 2006
grandmonacohosts.com	April 13, 2006
grandmonacolottery.com	January 3, 2006
grandmonacolotto.com	January 3, 2006

grandmonacolounge.com	April 7, 2006
grandmonacomahjong.com	August 23, 2006
grandmonacomillions.com	December 21, 2005
grandmonaconews.com	April 18, 2006
grandmonaconlinecasino.com	March 15, 2006
grandmonaconlinegaming.com	March 15, 2006
grandmonaconlinepoker.com	March 15, 2006
grandmonacopartners.com	August 23, 2006
grandmonacoplayersclub.com	April 7, 2006
grandmonacopoker.com	December 19, 2005
grandmonacopokerclub.com	December 21, 2005
grandmonacopromotions.com	February 20, 2006
grandmonacoracebook.com	February 3, 2006
grandmonacorewards.com	May 31, 2006
grandmonacoskillgames.com	January 3, 2006
grandmonacoslots.com	January 3, 2006
grandmonacosports.com	January 3, 2006
grandmonacosportsbook.com	January 3, 2006
grandmonacostore.com	January 3, 2006
grandmonacosupport.com	May 31, 2006
grandmonacovideopoker.com	February 20, 2006
grandmonaco.net	December 19, 2005
casinograndmonaco.net	December 19, 2005
grandmonacobingo.net	January 3, 2006
grandmonacocasino.net	December 19, 2005
grandmonacocasinoclub.net	December 21, 2005
grandmonacogames.net	February 20, 2006
grandmonacogaming.net	February 20, 2006
grandmonacolottery.net	January 3, 2006
grandmonacomillions.net	December 21, 2005
grandmonacoplayersclub.net	April 7, 2006
grandmonacopoker.net	December 19, 2005
grandmonacopokerclub.net	December 21, 2005
grandmonacoracebook.net	February 3, 2006
grandmonacoskillgames.net	January 3, 2006

grandmonacosports.net	January 3, 2006
grandmonacosportsbook.net	January 3, 2006
pokergrandmonaco.net	December 19, 2005
grandmonaco.org	December 19, 2005
casinograndmonaco.org	December 19, 2005
grandmonacocasino.org	December 19, 2005
grandmonacocasinoclub.org	December 21, 2005
grandmonacomillions.org	December 21, 2005
grandmonacopoker.org	December 19, 2005
grandmonacopokerclub.org	December 21, 2005
grandmonacoracebook.org	February 3, 2006
pokergrandmonaco.org	December 19, 2005

All the registration agreements incorporate the Policy. A true and correct copy of the Policy that applies to the domain names in question is provided as Annex [B] to this Complaint.

V. Factual and Legal Grounds

(Policy, paras. 4(a), (b), (c); Rules, para. 3)

[11.] This Complaint is based on the following grounds:

A. The domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

(Policy, para. 4(a)(i), Rules, paras. 3(b)(viii), (b)(ix)(1))

- The Société des Bains de Mer has been operating the Casino de Monte Carlo in Monaco for more than 140 years at the date of this complaint. The casino has become famous worldwide as one of the most significant symbols of the Principauté de Monaco. It attracts a clientele that comes from numerous European and non-European countries.
- The Société des Bains de Mer is the founder and manager of the Casino de Monte Carlo in Monaco. Since April 2, 1863, the Société des Bains de Mer has been granted by the authorities of the Principauté de Monaco a

monopoly for casino and gambling industries for the territory of the Principauté de Monaco, and is therefore the sole company that can organize games and gambling in Monaco (*Privilège des Jeux*, renewed for the last time by the *Ordonnance Souveraine* n°8834 of 24 March 1987, a copy of this *Ordonnance* is attached in Annex [C]).

- Complainant has registered several trademarks including the international word mark "Casino de Monaco" which was registered on 19 December 2002; see Annex [D], and the comparable United States Federal trademark application filed on 24 December 2002 placed as Annex [E].
- All the disputed domains are confusingly similar to the Complainant's trademarks. They all contain the terms "Grand" and "Monaco" and many of them include an additional term:

(1) The domain names composed of the terms "Grand", "Monaco" and "Casino"

This concerns the following disputed domain names:

- casinograndmonaco.com
- grandmonacocasino.com
- grand-monaco-casino.com
- casinograndmonaco.net
- grandmonacocasino.net
- casinograndmonaco.org
- grandmonacocasino.org

These domain names are confusingly similar to the Complainant's trademark as they incorporate both nouns, "Casino" and "Monaco", of Complainant's trademarks. Having inverted the order of the nouns in the mark does not render the following disputed domain names dissimilar from the Complainant's trademarks: grandmonacocasino.com; grand-monaco-casino.com; grandmonacocasino.net and grandmonacocasino.org. The inversion merely reflects a difference in usage or placement of the adjectively used noun (Monaco) in relation to the principal noun (casino) between the French and the English language. The WIPO Panel arrived to a

similar conclusion in the matter D2005-0527 regarding the domain name <montecarloresortcasino.com> as it stated: *"The disputed domain name incorporates the two nouns of Complainant's trademark "Monte Carlo" and "casino", the combination of which is distinctive for, and immediately brings to mind Complainant's business activities. These two nouns are the most distinctive part both in Complainant's trademark and the domain name at issue. The preposition "de" has little distinguishing effect, and even more so the omission of it in the domain name at issue."*

The addition of the generic term "grand" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark. In decision D2000-0253, a WIPO Panel found that *"The domain name in issue -- QUIXTARMORTGAGE.COM -- is legally identical to Complainant's mark, QUILXTAR. The addition of the generic terms "MORTGAGE" and ".COM" to the domain name in dispute has little, if any, affect on a determination of legal identity between the domain name and the mark."*

"Grand" is moreover frequently associated with the casino business as many casinos are simply called "Grand Casino" such as the casinos in Biloxi and Gulfport (Mississippi), Coushatta (Louisiana), Mille Lacs (Minnesota), Helsinki (Finland), MGM Grand in Las Vegas (Nevada) and Detroit (Michigan), and Baden and Luzern (Switzerland). The term "Grand" is a French word meaning large, great, lavish, sublime or sumptuous and therefore naturally applies to casinos wishing to convey a luxurious and prestigious image to the public. In WIPO decision D2004-0415, the panel found, as concerns the domain <monte-carlogrand.com>, that: *"Furthermore, the addition of the term "grand" to the domain name number two does not detract from the similarity to the Complainant's trademark. The Complainant has sufficiently evidenced, in the opinion of the Panel, that such term is strongly linked to the casino industry. Such relationship is evidenced not only by the fact that a renowned casino of Las Vegas is identified with such term, but also due to the large number of entries found with the search engine "Google" when the terms "grand" and "casino" are independently entered, or the joint term "grand casino" (such fact is also confirmed by the circumstance that the "Casino Gran Madrid", located in Madrid, includes in*

its name the translation of the term "grand" into Spanish). This Panel has verified, through these searches, that this term is commonly used in the casino industry and, consequently, the addition and association of "grand" to the term "Monte-Carlo" evokes the Casino de Monte-Carlo." Similar decisions have been rendered by WIPO arbitration panels in D2005-0404 regarding the domain name <luckymontecarlocasino.com>, in D2000-1328 regarding the domain name <montecarlojackpot.com> and in D2005-1342 regarding the domain name <montecarlograndcasino.com>.

All these elements show that the Respondents' domain names composed of the terms "Grand", "Monaco" and "Casino" are confusingly similar to the prior trademarks in which the Complainant has rights.

(2) The domain names composed of the terms "Grand", "Monaco", "Casino" and a generic term

This concerns the following disputed domain names:

- grandmonacocasinoclub.com
- grandmonacoonlinecasino.com
- grandmonacocasinoclub.net
- grandmonacocasinoclub.org

In addition to the arguments raised in paragraph (1) above, the Complainant would like to point out that having added the generic term "club" or "online" to the disputed domain names does not render them dissimilar from the Complainant's trademark. On the contrary, the generic terms "club" and "online" strengthen the confusion since the first one refers to the fact that non virtual casinos are often organized in games circles, societies and the second one induces that e-gaming services are offered by the well-know Casino de Monte-Carlo in Monaco. A WIPO Panel found in the WIPO decision D2000-1425 on <creditlyonnaisonline.com> that:

"CREDIT LYONNAIS" is Complainant's registered trademark. The domain name "creditlyonnaisonline.com" is confusingly similar to Complainant's trademark. The addition of the terms "online" is not sufficient to avoid confusion. On the contrary, the word "online" strengthens the confusion since it induces e-banking services offered by this worldwide known banking

operator. With regard to avoiding confusion, the addition of the top level domain name ".com" is irrelevant. "

As a consequence, the Respondents' domain names composed of the terms "Grand", "Monaco", "Casino" and a generic term such as "club" or "online" are confusingly similar to the prior trademarks in which the Complainant has rights.

(3) The domain names only composed of the terms "Grand" and "Monaco"

This concerns the following disputed domain names:

- grandmonaco.com
- grand-monaco.com
- grandmonaco.net
- grandmonaco.org

As already mentioned in paragraph (1) above, the word "Grand" is frequently associated with the casino business. So is the word "Monaco" as the Principality of Monaco has a long-standing worldwide reputation with respect to the casino activities that are offered on its territory.

Therefore, when the term "Grand" is associated with "Monaco", it necessarily induces, for the public, the Casino de Monte-Carlo in Monaco as already found by a WIPO Panel in decision D2004-0415 concerning the domain <monte-carlogrand.com> (see paragraph (1) above).

Therefore, the Respondents' domain names composed of the two terms "Grand" and "Monaco" are confusingly similar to the prior trademarks in which the Complainant has rights.

(4) The domain names composed of the terms "Grand", "Monaco" and a generic term related to casino business

This concerns the following disputed domain names:

- grandmonacobingo.com

- grand-monaco-poker.com
- grandmonacocraps.com
- grandmonacogames.com
- grandmonacolottery.com
- grandmonacolotto.com
- grandmonacogaming.com
- grandmonacomahjong.com
- grandmonacomillions.com
- grandmonacoonlinegaming.com
- grandmonacoonlinepoker.com
- grandmonacoplayersclub.com
- grandmonacopoker.com
- grandmonacopokerclub.com
- grandmonacoracebook.com
- grandmonacorewards.com
- grandmonacoskillgames.com
- grandmonacoslots.com
- grandmonacovideopoker.com
- grandmonacobingo.net
- grandmonacogames.net
- grandmonacogaming.net
- grandmonacolottery.net
- grandmonacomillions.net
- grandmonacoplayersclub.net
- grandmonacopoker.net
- grandmonacopokerclub.net
- grandmonacoracebook.net
- grandmonacoskillgames.net
- pokergrandmonaco.net
- grandmonacomillions.org
- grandmonacopoker.org
- grandmonacopokerclub.org
- grandmonacoracebook.org
- pokergrandmonaco.org
- grandmonacosports.com
- grandmonacosportsbook.com

- grandmonacosports.net
- grandmonacosportsbook.net

The addition of a generic term related to the casino and gambling business (such as bingo, poker, craps, games, lottery rewards, slots, millions, players, etc...) before or after the term "grandmonaco" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark. On the contrary, these words strengthen the association that the public can make between these domains and the Complainant's famous casino.

The WIPO Panel arrived to a similar conclusion in the matter D2000-1332 regarding the domain name <monacogambling.com> as it stated: *"While it is not identical to the Domain Name, this registered trademark is similar if only by the ideas suggested by it, to the Domain Name "monacogambling.com", registered by the Respondent. The Panel is of the opinion that the registered words "Monaco" and "Gambling" are essentially synonyms to the words "Monte-Carlo" and "Casino", which happen to be the principal elements in the Complainant's Trademark. The Panel, applying its judicial knowledge is of the opinion that even though Monaco is the Principauté and Monte-Carlo is the city within this Principauté, these terms are used interchangeably by the public at large. The words ("monaco" and "gambling") used together create a strong similarity and impression that could easily induce the general public into believing that the Domain Name, the Domain Name proprietor and any web site operated from the Domain Name are associated with the Complainant."* A similar decision has been rendered by WIPO arbitration Panel in D2000-1328 regarding the domain name <montecarlojackpot.com>.

In addition, as concerns the generic terms "sports" and "sportsbook", the WIPO Panel already stated in D2005-0225 regarding the domain name <montecarlocasinoandsportsbook.com> that:

"The domain name at issue is not identical to a trade mark held by Complainant, and the question is then whether there is confusing similarity. The disputed domain name incorporates the two nouns "Monte-Carlo" and "Casino" of Complainant's trademark CASINO DE MONTE-CARLO with the addition of the term "sports book".

The terms "Monte-Carlo" and "Casino" are distinctive of, and immediately bring to mind Complainant's business activities.

As evidenced by the Complainant, "sports book" is a term that could easily be associated with casinos, the business of Complainant, as several casinos offers the possibility for their clients to wager on sports results in addition to their standard casino gambling activities, and the term "sports book" stands for the possibility of such betting on sports games. The Panel therefore finds that the term "sports book" is not distinguishing the domain name at issue from Complainant's trademark, but rather adds to the likelihood of confusion.

As a result of the above arguments, the Panel finds that the disputed domain name is confusingly similar to Complainant's trademark CASINO DE MONTE-CARLO."

The Respondents' domain names above are therefore confusingly similar to the prior trademarks in which the Complainant has rights.

(5) The domain names composed of the terms "Grand", "Monaco" and a generic term

- grandmonacoayda.com
- grandmonacoayuda.com
- grandmonacoclub.com
- grandmonacohost.com
- grandmonacohosts.com
- grandmonacolounge.com
- grandmonaconews.com
- grandmonacopartners.com
- grandmonacopromotions.com
- grandmonacostore.com
- grandmonacosupport.com

The addition of a generic term such as "host", "lounge", "club", "ayuda", "store", "news", "support" or "partners" to the terms "Grand" and "Monaco" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark.

Indeed, these generic terms have no distinctive value that would be strong enough to surpass the distinctiveness of the association of the terms "Grand" and "Monaco". Therefore, these generic terms are unable to cancel the strong risk of confusion that exists between the terms "Grand" and "Monaco" and the Complainant's trademarks. Moreover, these generic terms would rather be perceived as mere declinations of the domain names at stake: the "news" of the Grand Monaco, the "store" of the Grand Monaco, the "support" of the Grand Monaco, etc....

Moreover, all these disputed domain names point to the same online casino website (the homepage of the website to which the disputed domain names are pointing is attached in Annex [F]). This induces the general public into believing that the disputed domain names are associated with the Complainant.

As a consequence, the domain names composed of the terms "Grand", "Monaco" and a generic term are confusingly similar to the Complainant's trademarks.

(6) The domain name <deutschesgrandmonaco.com>

The addition of the generic term "deutsches" to "Grandmonaco" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark especially as the term "deutsches" means German in German language and points to the casino website attached in Annex [F] in its German-language version (see Annex [G]). Therefore, the addition of the term "deutsches" to the term "grandmonaco" induces the German public into believing that the disputed domain name is associated with the Complainant and is the German-language version of the Complainant's website.

Therefore, this disputed domain name is undoubtedly confusingly similar with the trademark owned by the Complainant.

B. The Respondents have no rights or legitimate interests in respect of the domain names;

(Policy, para. 4(a)(ii), Rules, para. 3(b)(ix)(2))

- The Complainant has searched Trademark database for possible trademark registrations or applications by the Respondents. It seems that no trademarks including the words "Grand" and "Monaco" have been registered by the Respondents in neither the United States of America nor any of the European countries. A copy of the results of this research is attached in Annex [H]. To the best of Complainant's knowledge, Respondents hold no intellectual property rights over any mark that contains the terms "Grand" and "Monaco".
- In addition, the Respondents are individuals residing in the United Kingdom (See the Whois information in Annex [A]), that is to say they have no geographical link with the Principauté de Monaco.
- Also the Respondents have not received any license or authorization from the authorities of the Principauté de Monaco to operate a casino in Monaco.
- Complainant has never authorized Respondents to use its 140-year old famous marks Casino de Monaco or Casino de Monte Carlo, nor to register and use the disputed domain names, and Complainant does not have any type of business relationship with Respondents.

The Respondents therefore have no rights or legitimate interests in the disputed domain names.

C. The domain names were registered and are being used in bad faith.

(Policy, paras. 4(a)(iii), 4(b); Rules, para. 3(b)(ix)(3))

- The Respondents are professionals in the gambling business. In fact, an Internet search on Respondents' name shows that M. Lucan Toh is the CEO of PlayShare, a UK company which presents itself as "*the new integrated*

operating platform behind the world class poker and casino gaming sites PokerShare.com and CasinoShare.com" (see Annex [I] a) and that M. Max Wright is Director of the gaming websites PokerShare.com and CasinoShare.com (both owned and operated by PlayShare) (see Annex [I] c). Moreover, an Internet search on Respondents' domain names shows that Respondents' website is operated by the Grand Gaming Group, which has been acquired by the PlayShare Group on November 1st 2006. Play Share Group has disclosed in the press that it is seeking *"to be one of the top 5 gaming companies within the next two years"* (see Annex [I] b).

- As managers of a gaming company, Respondents can only have been acting in bad faith when they registered the disputed domain names knowing that they were confusingly similar to Complainant's famous casino in Monaco. The strong notoriety and world renown of Complainant's marks make it impossible for Respondents to claim that they ignored that the registration of the disputed domain names would violate Complainant's rights.

Moreover, Complainant has a strong policy of protection for its famous marks. In this respect, WIPO already ordered the transfer of many domain names to the Complainant, see Annex [J]. Respondents, who are professionals in the gaming business, were necessarily aware of, or should have reasonably been aware of, the fact that Complainant has a strong policy in protecting and enforcing its intellectual property rights and preserving its reputation and renown from being unduly used by third parties.

- The fact that Respondents have taken the precaution of mentioning at the bottom of each page of the disputed domain names the following disclaimer: *"Grand Monaco is a Hillstead Limited, Gibraltar site - now a member of the PlayShare group. Grand Monaco is in NO way associated with the Principality of Monaco, nor ANY of the land-based casino operations located in that jurisdiction. Grand Monaco is an independent operation."* is another proof of the Respondents' bad faith (see Annex [K]). If Respondents have considered it necessary to draw the attention of Internet users on the fact that Grand Monaco is not associated with the Principality of Monaco it is obviously because they knew that there is undoubtedly a risk of

confusion with Complainant's famous casino in Monaco. Moreover the discretion of this warning which appears at the bottom of the disputed domain names' pages in small characters is another clear example of Respondents' bad faith.

Also, the presence of a discrete disclaimer on the website itself does not alter the Respondents' bad faith as Internet users cannot see this disclaimer when they type the disputed domain names in their Internet browser. It is at that time that they are attracted by these domain names and that there is a confusion with the Complainant's famous casino in Monaco.

- In addition, the Respondents are passing off on Complainant's trademarks and renown in order to attract Internet users for commercial gain and therefore clearly falls within the example given in the Policy's article 4.b.iv. The value of the disputed domain names for a professional in the online casino business lies in their close resemblance and confusability with Complainant's registered trademark. The WIPO Panel arrived to a similar decision in decision D2003-0246 regarding the domain name <swisscasino.com>. Indeed, except for the following disputed domain names:

<grand-monaco-poker.com>
 <grandmonacoonlinepoker.com>
 <grandmonacopoker.com>
 <grandmonacopokerclub.com>
 <grandmonacovideopoker.com>
 <grandmonacopoker.net>
 <grandmonacopokerclub.net>
 <pokergrandmonaco.net>
 <grandmonacopoker.org>
 <grandmonacopokerclub.org>
 <pokergrandmonaco.org>

all the disputed domain names point to the same casino website.

- Clearly, Internet users who type the disputed domain names in their browser would believe that they access a gambling website operated by the owner of

the well-known casino in Monaco, Complainant, while this is not the case. This is obviously a source of confusion for Internet users.

- Creating such strong likelihood of confusion between Complainant's casino and the Respondents' website is a clear example of bad faith not only during the registration process of the disputed domain names but also in the use of disputed domain names.
- As per the above mentioned domain names which do not point directly to a casino website (see Annex [L]), they are nevertheless also used in bad faith. Indeed, the currently inactive use of the disputed domain names clearly shows bad faith. The disputed domain names were registered one year ago but have yet to be used in an active manner. As Respondents clearly know how to create websites it must be gathered that one year has been ample time to create websites for the disputed domain names and therefore, at this stage, it can only be concluded that the Respondents have acquired the disputed domain names to prevent Complainant from using them. Such a passive use demonstrates bad faith use and registration of the disputed domain names as exemplified in the Policy's article 4.b.ii.
- Should Respondents nevertheless claim to have registered the disputed domain names with the intent of an active use, it cannot be imagined how this could be done in a legitimate manner since Respondents are the owner of an online casino. Should Respondents wish to put the disputed domain names to use they will most likely be used to forward Internet users to the casino website to which all the other disputed domain names already point.

From the outset of the UDRP arbitration procedure the WIPO Mediation and Arbitration center found that inactive use of a domain name could constitute bad faith as stated in decision D2000-0003 regarding the domain name <Telstra.org>. Decision D2000-0028 regarding the domain name <cellularonechine.com> moreover found that inactive use of a registered domain name may be evidence of intent to sell the domain name for

commercial gain¹. A similar matter to the one that is subject matter of this arbitration was presented to the WIPO Mediation and Arbitration center in case D2005-1342 concerning the domain name

<montecarlograndcasino.com> in which the WIPO Panel decided that:

"As far as the question is concerned, whether the Respondent uses the disputed domain names in bad faith, it appears from the information available to the Panel that they are not in use since they are not linked with an active website.

Since the Telstra case (Telstra Corporation Limited v. Nuclear Marshmallows, WIPO Case No. D2000-0003), various administrative panels held that the passive use of a domain name constitutes bad faith registration and use under certain circumstances. The panel of that case noted that the question whether inactivity by the respondent constitutes bad faith depends "on the particular facts of a specific case" and that the "Administrative Panel must give close attention to all circumstances of the Respondent's behavior".

The Respondent has engaged in "passive holding" of the domain names at issue. The Respondent has also failed to file a response or make any attempt to traverse the claims and submissions made by the Complainant.

Moreover, the Respondent must have been aware of the Complainant and therefore, intentionally chose to register the domain names. Any attempt to actively use any of the two domain names at issue would inevitably lead to a likelihood of confusion to the source, sponsorship, affiliation, or endorsement of the registrant's website among Internet users who would inevitably be led to believe that such website would be owned by, controlled by, established by or in some way associated with the Complainant (Ladbroke Group Plc v. Sonoma International LDC, WIPO Case No. D2002-0131).

Such use could start at Respondent's choice any day and would be clearly contrary to the Complainant's legal rights and legitimate interests. As stated in previous UDRP decisions, "to argue that the Complainant should have to wait for some future use of the disputed domain names to occur in order to demonstrate Respondent's bad faith use is to render intellectual property law into an instrument of abuse by the Respondent. The fact that this misappropriation may occur in any as yet undetermined manner at an uncertain future date does negate the Respondent's bad faith. On the contrary, it raises the specter of continuing bad faith abuse by the Respondent of the Complainant's trademarks and legitimate business

¹ *"While in most situations of non-use, it may be impossible to draw any conclusion about a party's intent to sell, the facts here do permit such an inference. It has been noted that the Domain Name contains only Complainant's coined registered trademark and the country name "China." It would be difficult, perhaps impossible, for Respondent to use the Domain Name as the name of any business, product or service for which it would be commercially useful without violating Complainant's rights. Accordingly, in the absence of any claim by the Respondent that he intends to do otherwise, it is a permissible inference to conclude, and the Panel does conclude, that subparagraph (i) is applicable to the instance situation."*

interests" (Cellular One Group v. Paul Brien, WIPO Case No. D2000-0028; Myer Stores Limited v. David John Singh, WIPO Case No. D2001-0763; Comerica Inc. v. Horoshy, Inc., WIPO Case No. D2004-0615)."

All these elements, and *inter alia* the world renown of the Complainant's trademarks, show that the disputed domain names have both been registered and used in bad faith by the Respondents.

VI. Remedies Requested

(Rules, para. 3(b)(x))

[12.] In accordance with Paragraph 4(i) of the Policy, for the reasons described in Section V above, the Complainant requests the Administrative Panel appointed in this administrative proceeding issue a decision that the contested domain names:

grandmonaco.com
 casinograndmonaco.com
 grandmonacocasino.com
 deutschesgrandmonaco.com
 grandmonacoayda.com
 grandmonacoayuda.com
 grandmonacobingo.com
 grand-monaco.com
 grand-monaco-casino.com
 grand-monaco-poker.com
 grandmonacocasinoclub.com
 grandmonacoclub.com
 grandmonacocraps.com
 grandmonacogames.com
 grandmonacogaming.com
 grandmonacohost.com
 grandmonacohosts.com
 grandmonacolottery.com
 grandmonacolotto.com
 grandmonacolounge.com
 grandmonacomahjong.com
 grandmonacomillions.com
 grandmonaconews.com
 grandmonacoonlinecasino.com
 grandmonacoonlinegaming.com
 grandmonacoonlinepoker.com
 grandmonacopartners.com
 grandmonacoplayersclub.com
 grandmonacopoker.com
 grandmonacopokerclub.com
 grandmonacopromotions.com
 grandmonacoracebook.com
 grandmonacorewards.com

grandmonacoskillgames.com
grandmonacoslots.com
grandmonacosports.com
grandmonacosportsbook.com
grandmonacostore.com
grandmonacosupport.com
grandmonacovideopoker.com
grandmonaco.net
casinograndmonaco.net
grandmonacobingo.net
grandmonacocasino.net
grandmonacocasinoclub.net
grandmonacogames.net
grandmonacogaming.net
grandmonacolottery.net
grandmonacomillions.net
grandmonacoplayersclub.net
grandmonacopoker.net
grandmonacopokerclub.net
grandmonacoracebook.net
grandmonacoskillgames.net
grandmonacosports.net
grandmonacosportsbook.net
pokergrandmonaco.net
grandmonaco.org
casinograndmonaco.org
grandmonacocasino.org
grandmonacocasinoclub.org
grandmonacomillions.org
grandmonacopoker.org
grandmonacopokerclub.org
grandmonacoracebook.org
pokergrandmonaco.org

be transferred to the Complainant.

VII. Administrative Panel

(Rules, para. 3(b)(iv))

[13.] The Complainant elects to have the dispute decided by a single-member Administrative Panel.

If the Respondents choose the three-member Administrative Panel, the Complainant provides the following names of three persons, one of whom the Center shall attempt to appoint to the Administrative Panel in accordance with

Paragraph 6 of the Rules and Paragraph 7 of the Supplemental Rules: François Dessemontet, Dawn Osborne and Christophe Caron.

VIII. Mutual Jurisdiction

(Rules, para. 3(b)(xiii))

[14.] In accordance with Paragraph 3(b)(xiii) of the Rules, the Complainant will submit, with respect to any challenges that may be made by the Respondents to a decision by the Administrative Panel to transfer or cancel the domain names that are the subject of this Complaint, to the jurisdiction of the courts of the United States of America, where the Registrar is located.

IX. Other Legal Proceedings

(Rules, para. 3(b)(xi))

[15.] The disputed domain names are not currently subject to any other legal proceedings.

X. Communications

(Rules, paras. 2(b), 3(b)(xii); Supplemental Rules, paras. 3, 4)

[16.] A copy of this amended Complaint, together with the cover sheet as prescribed by the Supplemental Rules, has been sent or transmitted to M. Lucan Toh and Max Wright on by email (calan.horsman@playshare.com) and a hardcopy version of the Complaint and annexes have been sent by courier service.

[17.] A copy of this amended Complaint has been sent or transmitted to the concerned registrar on March 21, 2007 by fax to Laurie Anderson (+1 480 505 8844) and a hardcopy of the Complaint and annexes was sent by mail.

[18.] This amended Complaint is submitted to the Center in electronic form, and in four (4) hardcopy sets together with the original.

XI. Payment

(Rules, para. 19; Supplemental Rules, Annex D)

[19.] As required by the Rules and Supplemental Rules, payment in the amount of USD 6,000 has been made by electronic transfer.

XII. Certification

(Rules, para. 3(b)(xiv))

[20.] The Complainant agrees that its claims and remedies concerning the registration of the domain names, the dispute, or the dispute's resolution shall be solely against the domain names holder and waives all such claims and remedies against (a) the WIPO Arbitration and Mediation Center and Panelists, except in the case of deliberate wrongdoing, (b) the concerned registrar, (c) the registry administrator, (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

[21.] The Complainant certifies that the information contained in this Complaint is to the best of the Complainant's knowledge complete and accurate, that this Complaint is not being presented for any improper purpose, such as to harass, and that the assertions in this Complaint are warranted under the Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully submitted,

A handwritten signature in black ink, consisting of a long horizontal stroke followed by a vertical stroke and a small loop at the end.

Julien Horn

Date: 21 March, 2007

ANNEXES

Annex [A] Printouts of the WhoIs information concerning the disputed domain names ;

Annex [B] ICANN domain name dispute policy ;

Annex [C] Ordonnance Souveraine n°8834 of March 24, 1987 ;

Annex [D] International Trademark "Casino de Monaco", WO 793812 ;

Annex [E] Complainant's United States Federal trademark, US 76478796 ;

Annex [F] Homepage of the website to which the disputed domain names (except those mentioned in section C.) are pointing ;

Annex [G] Homepage of the website to which the disputed domain name <deutschesgrandmonaco.com > is pointing ;

Annex [H] Result of the search for any trademarks held by the Respondents ;

Annex [I] a) Printout of the PR Web press release;

b) Printout of the Microgaming Casinos page;

c) Printout of Igaming Business website;

Annex [J] List of Complainant's WIPO cases

Annex [K] Pages of the website to which the disputed domain names (except those mentioned in section C.) are pointing

Annex [L] Pages to which the domain names listed in section C. are pointing

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WHOIS
Search Results for: **CASINOGRANDMONACO.COM**

Search Again
 Enter a Domain Name to Check
 .com

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: CASINOGRANDMONACO.COM
Created on: 19-Dec-05
Expires on: 19-Dec-07
Last Updated on: 19-Dec-06

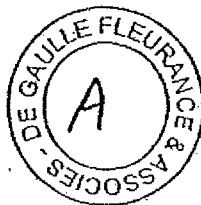
Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK21.SECURESERVER.NET
PARK22.SECURESERVER.NET

Registry Status: ok

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- ☐ CASINOGRANDMONACO. \$9.99/yr NAME
- ☐ CASINOGRANDMONACONLS \$8.95/yr INE.COM
- ☐ ONLINECASINOGRANDMON \$8.95/yr ACO.COM
- ☐ CASINOGRANDMONACOHOM \$8.99/yr E.NET
- ☐ HOMECASINOGRANDMONAC \$8.99/yr O.NET
- ☐ CASINOGRANDMONACOSIT \$8.99/yr E.ORG
- ☐ SITECASINOGRANDMONAC \$8.99/yr O.ORG
- ☐ CASINOGRANDMONACOWEB \$8.99/yr SAVE! INFO
- ☐ WEBCASINOGRANDMONAC \$8.99/yr SAVE! INFO
- ☐ CASINOGRANDMONACOLIV \$6.99/yr SAVE! E.BIZ
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WHOIS Search Results for: **CASINOGRANDMONACO.NET**

Search Again: Enter a Domain Name to Check .com **GO!**

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Registrant:
Max Wright
46 Berkeley square
London, W1J 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: CASINOGRANDMONACO.NET
Created on: 19-Dec-05
Expires on: 19-Dec-07
Last Updated on: 19-Dec-06

Administrative Contact:
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London, W1J 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
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United Kingdom
2075984064

Domain servers in listed order:
PARK21.SECURESERVER.NET
PARK22.SECURESERVER.NET

Registry Status: ok

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- You might also consider:**
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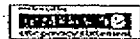
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noms de domaine

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WHOIS casinograndmonaco.org

Voici la réponse intégrale, sans modification, du serveur de l'organisme de gestion de ce nom de domaine. Il n'est pas mis à jour dès l'enregistrement, mais parfois jusqu'à 24h après.

NOTICE: Access to .ORG WHOIS information is provided to assist persons in determining the contents of a domain name registration record in the Public Interest Registry registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and Public Interest Registry does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator or any ICANN-Accredited Registrar, except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D109657496-LROR
Domain Name:CASINOGRANDMONACO.ORG
Created On:19-Dec-2005 06:51:49 UTC
Last Updated On:19-Dec-2006 10:02:38 UTC
Expiration Date:19-Dec-2007 06:51:49 UTC
Sponsoring Registrar:Go Daddy Software, Inc. (R91-LROR)
Status:OK
Registrant ID:GODA-025057993
Registrant Name:Max Wright
Registrant Street1:46 berkeley square
Registrant Street2:
Registrant Street3:
Registrant City:London
Registrant State/Province:
Registrant Postal Code:w1j 5at
Registrant Country:GB
Registrant Phone:+44.2075984064
Registrant Phone Ext.:
Registrant FAX:
Registrant FAX Ext.:
Registrant Email:calan.horsman@playshare.com
Admin ID:GODA-225057993
Admin Name:Max Wright
Admin Street1:46 berkeley square
Admin Street2:
Admin Street3:
Admin City:London
Admin State/Province:
Admin Postal Code:w1j 5at
Admin Country:GB
Admin Phone:+44.2075984064
Admin Phone Ext.:
Admin FAX:
Admin FAX Ext.:
Admin Email:calan.horsman@playshare.com
Tech ID:GODA-125057993
Tech Name:Max Wright
Tech Street1:46 berkeley square
Tech Street2:
Tech Street3:
Tech City:London
Tech State/Province:
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Name Server:PAK21.SECURESERVER.NET
Name Server:PAK22.SECURESERVER.NET
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:

Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:

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WHOIS

Search Results for: **DEUTSCHESGRANDMONACO.COM**

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: DEUTSCHESGRANDMONACO.COM
Created on: 03-Aug-06
Expires on: 03-Aug-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK29.SECURESERVER.NET
PARK30.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ DEUTSCHESGRANDMONACO8.99/yr NET
- ☐ DEUTSCHESGRANDMONACO8.99/yr ORG
- ☐ DEUTSCHESGRANDMONACO8.99/yr SAVE! INFO
- ☐ DEUTSCHESGRANDMONACO8.99/yr SAVE! BIZ
- ☒ DEUTSCHESGRANDMONACO8.99/yr US
- ☒ DEUTSCHESGRANDMONACO8.99/yr NAME

You might also consider:

- ☐ DEUTSCHESGRANDMONACO8.99/yr ONLINE.COM
- ☐ ONLINEDEUTSCHESGRAND \$8.95/yr MONACO.COM
- ☐ DEUTSCHESGRANDMONACO8.99/yr HOME.NET
- ☐ HOMEDEUTSCHESGRANDMONACO8.99/yr NACO.NET
- ☐ DEUTSCHESGRANDMONACO8.99/yr SITE.ORG
- ☐ SITEDEUTSCHESGRANDMONACO8.99/yr NACO.ORG
- ☐ DEUTSCHESGRANDMONACO8.99/yr SAVE! WEB.INFO
- ☐ WEBDEUTSCHESGRANDMONACO8.99/yr SAVE! ACO.INFO
- ☐ DEUTSCHESGRANDMONACO8.99/yr SAVE! LIVE.BIZ
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WHOIS Search Results for: GRANDMONACOCASINO.COM

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley Square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOCASINO.COM
Created on: 23-Jun-05
Expires on: 23-Jun-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK13.SECURESERVER.NET
PARK14.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ GRANDMONACOCASINO. \$6.99/yr SAVE! BIZ
- ☐ GRANDMONACOCASINO.US \$7.99/yr
- ☐ GRANDMONACOCASINO. \$9.99/yr NAME
- ☐ GRANDMONACOCASINDONLINE.COM \$8.99/yr
- ☐ ONLINEGRANDMONACOCASINO.COM \$8.99/yr
- ☐ GRANDMONACOCASINOHOMES.E.NET \$8.99/yr
- ☐ HOMEGRANDMONACOCASINO.O.NET \$8.99/yr
- ☐ GRANDMONACOCASINOSITE.E.ORG \$8.99/yr
- ☐ SITEGRANDMONACOCASINO.O.ORG \$8.99/yr
- ☐ GRANDMONACOCASINOWEBINFO \$8.99/yr SAVE! INFO
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Registrant:
Max Wright
46 Berkeley square
London, W1J 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACO.COM
Created on: 23-Oct-04
Expires on: 23-Oct-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
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United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

See Underlying Registry Data
Report Invalid Whois

Available TLDs

- ☐ GRANDMONACO.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACO.US \$7.99/yr
- ☐ GRANDMONACO.NAME \$9.99/yr
- ☐ GRANDMONACOOONLINE.COM \$8.99/yr
- ☐ GRANDMONACOHOMENET \$8.99/yr
- ☐ HOMEGRANDMONACONET \$8.99/yr
- ☐ GRANDMONACOSITE.ORG \$8.99/yr
- ☐ SITEGRANDMONACO.ORG \$8.99/yr
- ☐ GRANDMONACOWEB.INFO \$0.99/yr SAVE!
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WHOIS Search Results for: GRAND-MONACO.COM

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 berkeley square
London, w1j 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRAND-MONACO.COM
Created on: 21-Dec-05
Expires on: 21-Dec-07
Last Updated on: 21-Dec-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☒ GRAND-MONACO.ORG \$9.99/yr
- ☐ GRAND-MONACO.INFO \$9.99/yr SAVE!
- ☐ GRAND-MONACO.BIZ \$6.99/yr SAVE!
- ☒ GRAND-MONACO.US \$7.99/yr
- ☒ GRAND-MONACO.NAME \$9.99/yr
- You might also consider:**
- ☒ GRAND-MONACO.ONLINE \$8.95/yr COM
- ☐ ONLINEGRAND-MONACO \$8.95/yr COM
- ☐ GRAND-MONACO.HOME.NET \$9.99/yr
- ☐ HOMEGRAND-MONACO.NET \$9.99/yr
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Registrant:
Max Wright
46 berkeley square
London, w1j 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACO.NET
Created on: 19-Dec-05
Expires on: 19-Dec-07
Last Updated on: 19-Dec-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK21.SECURESERVER.NET
PARK22.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ GRANDMONACO.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACO.US \$7.99/yr
- ☐ GRANDMONACO.NAME \$9.99/yr
- ☐ You might also consider:
- ☐ GRANDMONACONLINE.COM \$8.95/yr
- ☐ GRANDMONACOKOME.NET \$8.99/yr
- ☐ HOMEGRANDMONACO.NET \$8.99/yr
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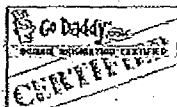
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WHOIS grandmonaco.org

Voici la réponse intégrale, sans modification, du serveur de l'organisme de gestion de ce nom de domaine. Il n'est pas mis à jour dès l'enregistrement, mais parfois jusqu'à 24h après.

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Domain ID:D109657498-LROR
 Domain Name:GRANDMONACO.ORG
 Created On:19-Dec-2005 06:51:50 UTC
 Last Updated On:19-Dec-2006 10:02:45 UTC
 Expiration Date:19-Dec-2007 06:51:50 UTC
 Sponsoring Registrar:Go Daddy Software, Inc. (R91-LROR)
 Status:OK

Registrant ID:GODA-025058001
 Registrant Name:Max Wright
 Registrant Street1:46 berkeley square
 Registrant Street2:
 Registrant Street3:
 Registrant City:London
 Registrant State/Province:
 Registrant Postal Code:w1j Sat
 Registrant Country:GB
 Registrant Phone:+44.2075984064
 Registrant Phone Ext.:
 Registrant FAX:
 Registrant FAX Ext.:
 Registrant Email:calan.horsman@playshare.com

Admin ID:GODA-225058001
 Admin Name:Max Wright
 Admin Street1:46 berkeley square
 Admin Street2:
 Admin Street3:
 Admin City:London
 Admin State/Province:
 Admin Postal Code:w1j Sat
 Admin Country:GB
 Admin Phone:+44.2075984064
 Admin Phone Ext.:
 Admin FAX:
 Admin FAX Ext.:
 Admin Email:calan.horsman@playshare.com

Tech ID:GODA-125058001
 Tech Name:Max Wright
 Tech Street1:46 berkeley square
 Tech Street2:
 Tech Street3:
 Tech City:London
 Tech State/Province:
 Tech Postal Code:w1j Sat
 Tech Country:GB
 Tech Phone:+44.2075984064
 Tech Phone Ext.:
 Tech FAX:
 Tech FAX Ext.:
 Tech Email:calan.horsman@playshare.com
 Name Server:PAK21.SECURESERVER.NET
 Name Server:PAK22.SECURESERVER.NET
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:

INDOM - Noms de domaine

Page 2 of 2

Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley Square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOAYUDA.COM
Created on: 27-Jul-06
Expires on: 27-Jul-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK3.SECURESERVER.NET
PARK4.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
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Available TLDs

- ☐ GRANDMONACOAYUDA.NET \$8.99/yr
- ☐ GRANDMONACOAYUDA.ORG \$8.99/yr
- ☐ GRANDMONACOAYUDA \$0.99/yr SAVE! INFO
- ☐ GRANDMONACOAYUDA.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOAYUDA.US \$7.99/yr
- ☐ GRANDMONACOAYUDA \$9.99/yr NAME
- ☐ You might also consider:
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- ☐ ONLINEGRANDMONACOAYUDA \$8.99/yr DA.COM
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- ☐ HOMEGRANDMONACOAYUDA \$8.99/yr NET
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- ☐ SITEGRANDMONACOAYUDA \$8.99/yr ORG
- ☐ GRANDMONACOAYUDA.WEB \$0.99/yr SAVE! INFO
- ☐ WEBGRANDMONACOAYUDA \$0.99/yr SAVE! INFO
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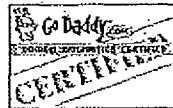
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Registrant:
Max Wright
46 Berkeley square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOBINGO.COM
Created on: 03-Jan-06
Expires on: 03-Jan-08
Last Updated on: 03-Jan-07

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

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- ☐ GRANDMONACOBINGO.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOBINGO.UK \$7.99/yr
- ☐ GRANDMONACOBINGO. \$9.99/yr NAME
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- ☐ ONLINEGRANDMONACOBINGO \$8.99/yr GO.COM
- ☐ GRANDMONACOBINGOHOMES \$9.99/yr NET
- ☐ HOMEGRANDMONACOBINGO \$8.99/yr NET
- ☐ GRANDMONACOBINGOSITE \$8.99/yr ORG
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WHOIS Search Results for: GRANDMONACOBINGO.NET

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 berkeley square
London, w1j 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOBINGO.NET
Created on: 03-Jan-06
Expires on: 03-Jan-08
Last Updated on: 03-Jan-07

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

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Search Results for: **GRAND-MONACO-CASINO.COM**

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRAND-MONACO-CASINO.COM
Created on: 21-Dec-05
Expires on: 21-Dec-07
Last Updated on: 21-Dec-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
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Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

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Available TLDs

- ☐ GRAND-MONACO-CASINO.ORG \$6.99/yr
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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley Square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOCASINO.NET
Created on: 19-Dec-05
Expires on: 19-Dec-07
Last Updated on: 19-Dec-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK21.SECURESERVER.NET
PARK22.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
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Available TLDs

- ☐ GRANDMONACOCASINO. \$6.99/yr SAVE! BIZ
- ☐ GRANDMONACOCASINO.US \$7.99/yr
- ☐ GRANDMONACOCASINO. \$9.99/yr NAME
- ☒ You might also consider:
- ☐ GRANDMONACOCASINOONLINE. \$9.99/yr INE.COM
- ☐ ONEINTEGRANDMONACOCASINO. \$9.99/yr INO.COM
- ☐ GRANDMONACOCASINOHOME. \$9.99/yr E.NET
- ☐ HOMEGRANDMONACOCASINO. \$9.99/yr O.NET
- ☐ GRANDMONACOCASINOSITE. \$9.99/yr E.ORG
- ☐ SITEGRANDMONACOCASINO. \$9.99/yr O.ORG
- ☐ GRANDMONACOCASINOWEBS. \$9.99/yr SAVE! INFO
- ☐ WEBGRANDMONACOCASINO. \$9.99/yr SAVE! INFO
- ☐ GRANDMONACOCASINOLIVE. \$6.99/yr SAVE! E.BIZ
- ☐ LIVEGRANDMONACOCASINO. \$6.99/yr SAVE! O.BIZ
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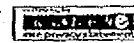
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noms de domaine

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WHOIS grandmonacocasino.org

Voici la réponse intégrale, sans modification, du serveur de l'organisme de gestion de ce nom de domaine. Il n'est pas mis à jour dès l'enregistrement, mais parfois jusqu'à 24h après.

NOTICE: Access to .ORG WHOIS information is provided to assist persons in determining the contents of a domain name registration record in the Public Interest Registry registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and Public Interest Registry does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator or any ICANN-Accredited Registrar, except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D109657500-LROR
 Domain Name:GRANDMONACOCASINO.ORG
 Created On:19-Dec-2005 06:51:50 UTC
 Last Updated On:19-Dec-2006 10:02:45 UTC
 Expiration Date:19-Dec-2007 06:51:50 UTC
 Sponsoring Registrar:Go Daddy Software, Inc. (R91-LROR)
 Status:OK

Registrant ID:GODA-025057934
 Registrant Name:Max Wright
 Registrant Street1:46 berkeley square
 Registrant Street2:
 Registrant Street3:
 Registrant City:London
 Registrant State/Province:
 Registrant Postal Code:w1j Sat
 Registrant Country:GB
 Registrant Phone:+44.2075984064
 Registrant Phone Ext.:
 Registrant FAX:
 Registrant FAX Ext.:
 Registrant Email:calan.horsman@playshare.com

Admin ID:GODA-225057934
 Admin Name:Max Wright
 Admin Street1:46 berkeley square
 Admin Street2:
 Admin Street3:
 Admin City:London
 Admin State/Province:
 Admin Postal Code:w1j Sat
 Admin Country:GB
 Admin Phone:+44.2075984064
 Admin Phone Ext.:
 Admin FAX:
 Admin FAX Ext.:
 Admin Email:calan.horsman@playshare.com

Tech ID:GODA-125057934
 Tech Name:Max Wright
 Tech Street1:46 berkeley square
 Tech Street2:
 Tech Street3:
 Tech City:London
 Tech State/Province:
 Tech Postal Code:w1j Sat
 Tech Country:GB
 Tech Phone:+44.2075984064
 Tech Phone Ext.:
 Tech FAX:
 Tech FAX Ext.:
 Tech Email:calan.horsman@playshare.com
 Name Server:PAK21.SECURESERVER.NET
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 Name Server:
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 Name Server:



INDOM - Noms de domaine





Page 2 of 2

Name Server:
Name Server:
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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
 Max Wright
 46 Berkeley Square
 London, W1J 5AT
 United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
 Domain Name: GRANDMONACOCASINOCLUB.COM
 Created on: 21-Dec-05
 Expires on: 21-Dec-07
 Last Updated on: 21-Dec-06

Administrative Contact:
 Wright, Max alan.horsman@playshare.com
 46 Berkeley Square
 London, W1J 5AT
 United Kingdom
 2075984064

Technical Contact:
 Wright, Max alan.horsman@playshare.com
 46 Berkeley Square
 London, W1J 5AT
 United Kingdom
 2075984064

Domain servers in listed order:
 PARK11.SECURESERVER.NET
 PARK12.SECURESERVER.NET

Registry Status: ok

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Available TLDs

- ☐ GRANDMONACOCASINOCLUB\$0.99/yr SAVE! B.INFO
- ☐ GRANDMONACOCASINOCLUB\$6.99/yr SAVE! B.BIZ
- ☐ GRANDMONACOCASINOCLUB\$7.99/yr B.US
- ☐ GRANDMONACOCASINOCLUB\$9.99/yr B.NAME

You might also consider:

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- ☐ ONLINEGRANDMONACOCASINOCLUB\$8.95/yr B.ONLINE.COM
- ☐ GRANDMONACOCASINOCLUB\$8.99/yr B.HOME.NET
- ☐ HOMEGRANDMONACOCASINOCLUB\$8.99/yr B.ONLINE.NET
- ☐ GRANDMONACOCASINOCLUB\$8.99/yr B.SITE.ORG
- ☐ SITEGRANDMONACOCASINOCLUB\$8.99/yr B.ONLINE.ORG
- ☐ GRANDMONACOCASINOCLUB\$0.99/yr SAVE! B.WEB.INFO
- ☐ WEBGRANDMONACOCASINOCLUB\$0.99/yr SAVE! B.ONLINE.INFO
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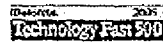
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Registrant:
Max Wright
46 Berkeley Square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOCASINOCUB.NET
Created on: 21-Dec-05
Expires on: 21-Dec-07
Last Updated on: 21-Dec-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

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Available TLDs

- ☐ GRANDMONACOCASINOCUB\$0.99/yr SAVE! B. INFO
- ☐ GRANDMONACOCASINOCUB\$0.99/yr SAVE! B. BIZ
- ☐ GRANDMONACOCASINOCUB\$0.99/yr B. US
- ☐ GRANDMONACOCASINOCUB\$0.99/yr B. NAME
- ☒ You might also consider:
- ☐ GRANDMONACOCASINOCUB\$0.95/yr BONLINE.COM
- ☐ ONLINEGRANDMONACOCASINOCUB\$0.95/yr INOCUB.COM
- ☐ GRANDMONACOCASINOCUB\$0.99/yr BHOME.NET
- ☐ HOMEGRANDMONACOCASINOCUB\$0.99/yr OCLUB.NET
- ☐ GRANDMONACOCASINOCUB\$0.99/yr BSITE.ORG
- ☐ SITEGRANDMONACOCASINOCUB\$0.99/yr OCLUB.ORG
- ☐ GRANDMONACOCASINOCUB\$0.99/yr SAVE! BWEB.INFO
- ☐ WEBGRANDMONACOCASINOCUB\$0.99/yr SAVE! CLUB.INFO
- ☐ GRANDMONACOCASINOCUB\$0.99/yr SAVE! BLIVE.BIZ
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noms de domaine

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WHOIS grandmonacocasinoclub.org

Voici la réponse intégrale, sans modification, du serveur de l'organisme de gestion de ce nom de domaine. Il n'est pas mis à jour dès l'enregistrement, mais parfois jusqu'à 24h après.

NOTICE: Access to .ORG WHOIS information is provided to assist persons in determining the contents of a domain name registration record in the Public Interest Registry registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and Public Interest Registry does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator or any ICANN-Accredited Registrar, except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D109814899-LROR
Domain Name:GRANDMONACOCASINOCCLUB.ORG
Created On:21-Dec-2005 15:16:16 UTC
Last Updated On:21-Dec-2006 09:50:56 UTC
Expiration Date:21-Dec-2007 15:16:16 UTC
Sponsoring Registrar:Go Daddy Software, Inc. (R91-LROR)
Status:OK
Registrant ID:GODA-025058002
Registrant Name:Max Wright
Registrant Street1:46 berkeley square
Registrant Street2:
Registrant Street3:
Registrant City:London
Registrant State/Province:
Registrant Postal Code:w1j 5at
Registrant Country:GB
Registrant Phone:+44.2075984064
Registrant Phone Ext.:
Registrant FAX:
Registrant FAX Ext.:
Registrant Email:calan.horsman@playshare.com
Admin ID:GODA-225058002
Admin Name:Max Wright
Admin Street1:46 berkeley square
Admin Street2:
Admin Street3:
Admin City:London
Admin State/Province:
Admin Postal Code:w1j 5at
Admin Country:GB
Admin Phone:+44.2075984064
Admin Phone Ext.:
Admin FAX:
Admin FAX Ext.:
Admin Email:calan.horsman@playshare.com
Tech ID:GODA-125058002
Tech Name:Max Wright
Tech Street1:46 berkeley square
Tech Street2:
Tech Street3:
Tech City:London
Tech State/Province:
Tech Postal Code:w1j 5at
Tech Country:GB
Tech Phone:+44.2075984064
Tech Phone Ext.:
Tech FAX:
Tech FAX Ext.:
Tech Email:calan.horsman@playshare.com
Name Server:PAK11.SECURESERVER.NET
Name Server:PAK12.SECURESERVER.NET
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WHOIS

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley square
London, W1J 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOAYDA.COM
Created on: 27-Jul-06
Expires on: 27-Jul-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK3.SECURESERVER.NET
PARK4.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ GRANDMONACOAYDA.NET \$8.99/yr
- ☐ GRANDMONACOAYDA.ORG \$8.99/yr
- ☐ GRANDMONACOAYDA.INFO \$9.99/yr SAVE!
- ☐ GRANDMONACOAYDA.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOAYDA.US \$7.99/yr
- ☐ GRANDMONACOAYDA.NAMES \$9.99/yr

You might also consider:

- ☐ GRANDMONACOAYDAONLINE \$8.99/yr E.COM
- ☐ ONLINEGRANDMONACOAYDA \$8.99/yr A.COM
- ☐ GRANDMONACOAYDAHOMES \$8.99/yr NET
- ☐ HOMEGRANDMONACOAYDA \$8.99/yr NET
- ☐ GRANDMONACOAYDASITE \$8.99/yr ORG
- ☐ SITEGRANDMONACOAYDA \$8.99/yr ORG
- ☐ GRANDMONACOAYDAWEB \$9.99/yr SAVE! INFO
- ☐ WEBGRANDMONACOAYDA \$9.99/yr SAVE! INFO
- ☐ GRANDMONACOAYDALIVE \$6.99/yr SAVE! BIZ
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Registrant:
Max Wright
46 Berkeley Square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOCCLUB.COM
Created on: 03-Jan-06
Expires on: 03-Jan-08
Last Updated on: 03-Jan-07

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

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Available TLDs

- ☐ GRANDMONACOCCLUB.NET \$8.99/yr
- ☐ GRANDMONACOCCLUB.ORG \$8.99/yr
- ☐ GRANDMONACOCCLUB.INFO \$8.99/yr SAVE!
- ☐ GRANDMONACOCCLUB.BIZ \$8.99/yr SAVE!
- ☐ GRANDMONACOCCLUB.JS \$7.99/yr
- ☐ GRANDMONACOCCLUB.NAMES \$9.99/yr
- ☒ You might also consider:
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- ☐ ONLINEGRANDMONACOCCLUB \$8.99/yr B.COM
- ☐ GRANDMONACOCCLUBHOME \$9.99/yr NET
- ☐ HOMEGRANDMONACOCCLUB \$8.99/yr NET
- ☐ GRANDMONACOCCLUBSITE \$8.99/yr ORG
- ☐ SITEGRANDMONACOCCLUB \$8.99/yr ORG
- ☐ GRANDMONACOCCLUBWEB \$9.99/yr SAVE! INFO
- ☐ WEBGRANDMONACOCCLUB \$9.99/yr SAVE! INFO
- ☐ GRANDMONACOCCLUBLIVE \$8.99/yr SAVE! BIZ
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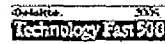
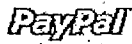
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WHOIS Search Results for: GRANDMONACOCRAP.COM

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Created on: 20-Feb-06
Expires on: 20-Feb-08
Last Updated on: 20-Feb-07

Administrative Contact:
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London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK15.SECURESERVER.NET
PARK16.SECURESERVER.NET

Registry Status: ok

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Available TLDs

- ☐ GRANDMONACOCRAP.NET \$8.99/yr
- ☐ GRANDMONACOCRAP.ORG \$8.99/yr
- ☐ GRANDMONACOCRAP. \$9.99/yr SAVE! RFO
- ☐ GRANDMONACOCRAP.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOCRAP.US \$7.99/yr
- ☐ GRANDMONACOCRAP. \$9.99/yr NAME
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- ☐ ONLINEGRANDMONACOCRAP \$8.99/yr PS.COM
- ☐ GRANDMONACOCRAP.HOM \$8.99/yr NET
- ☐ HOMEGRANDMONACOCRAP \$8.99/yr NET
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WHOIS Search Results for: GRANDMONACOGAMES.COM

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Last Updated on: 03-Jan-07

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United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

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Available TLDs

- ☐ GRANDMONACOGAMES.ORG \$8.99/yr
- ☐ GRANDMONACOGAMES. \$0.99/yr SAVE! INFO
- ☐ GRANDMONACOGAMES.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOGAMES.US \$7.99/yr
- ☐ GRANDMONACOGAMES. \$9.99/yr NAME

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- ☐ ONLINEGRANDMONACOGAMES \$8.95/yr ES.COM
- ☐ GRANDMONACOGAMESHOME \$8.99/yr NET
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- ☐ SITEGRANDMONACOGAMES \$8.99/yr ORG
- ☐ GRANDMONACOGAMESWEB \$0.99/yr SAVE! INFO
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WHOIS
Search Results for: **GRANDMONACOGAMES.NET**

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 .com

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Registrant:
Max Wright
46 Berkeley square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOGAMES.NET
Created on: 20-Feb-06
Expires on: 20-Feb-08
Last Updated on: 20-Feb-07

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK15.SECURESERVER.NET
PARK16.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ GRANDMONACOGAMES.ORG \$8.99/yr
- ☐ GRANDMONACOGAMES. \$0.99/yr SAVE! INFO
- ☐ GRANDMONACOGAMES.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOGAMES.UK \$7.99/yr
- ☐ GRANDMONACOGAMES. \$9.99/yr NAME

You might also consider:

- ☐ GRANDMONACOGAMES.ORG \$8.99/yr NE.COM
- ☐ ONLINEGRANDMONACOGAMES \$8.99/yr ES.COM
- ☐ GRANDMONACOGAMES.HOMAGE \$8.99/yr NET
- ☐ HOMEGRANDMONACOGAMES \$8.99/yr NET
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WHOIS
Search Results for: **GRANDMONACOGAMING.COM**

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46 berkeley square
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2075984064

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London, w1j 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK15.SECURESERVER.NET
PARK15.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
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Available TLDs

- ☐ GRANDMONACOGAMING. \$8.99/yr ORG
- ☐ GRANDMONACOGAMING. \$9.99/yr SAVE! INFO
- ☐ GRANDMONACOGAMING. \$6.99/yr SAVE! BIZ
- ☐ GRANDMONACOGAMING.US \$7.99/yr
- ☐ GRANDMONACOGAMING. \$9.99/yr NAME

You might also consider:

- ☐ GRANDMONACOGAMINGONLINE \$8.95/yr INFO.COM
- ☐ ONLINEGRANDMONACOGAMING \$8.95/yr INFO.COM
- ☐ GRANDMONACOGAMINGHOMES \$9.99/yr E.NET
- ☐ HOMEGRANDMONACOGAMING \$8.99/yr G.NET
- ☐ GRANDMONACOGAMINGSITE \$8.99/yr E.ORG
- ☐ SITEGRANDMONACOGAMING \$8.99/yr G.ORG
- ☐ GRANDMONACOGAMINGWEB \$8.99/yr SAVE! INFO
- ☐ WEBGRANDMONACOGAMING \$8.99/yr SAVE! INFO
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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 berkeley square
London, w1j 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOGAMING.NET
Created on: 20-Feb-06
Expires on: 20-Feb-08
Last Updated on: 20-Feb-07

Administrative Contact:
Wright, Max catan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max catan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK15.SECURESERVER.NET
PARK16.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
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Available TLDs

- ☐ GRANDMONACOGAMING.ORG \$8.99/yr
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- ☐ GRANDMONACOGAMING.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOGAMING.US \$7.99/yr
- ☐ GRANDMONACOGAMING.NAME \$9.99/yr

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- ☐ GRANDMONACOGAMINGONLINE.COM \$8.99/yr
- ☐ ONLINEGRANDMONACOGAMING.COM \$8.99/yr
- ☐ GRANDMONACOGAMINGHONORE.NET \$6.99/yr
- ☐ HOMEGRANDMONACOGAMING.G.NET \$8.99/yr
- ☐ GRANDMONACOGAMINGSITE.ORG \$8.99/yr
- ☐ SITEGRANDMONACOGAMING.ORG \$8.99/yr
- ☐ GRANDMONACOGAMINGWEB.ORG \$0.99/yr SAVE!
- ☐ WEBGRANDMONACOGAMING.ORG \$0.99/yr SAVE!
- ☐ GRANDMONACOGAMINGLIVE.ORG \$6.99/yr SAVE!
- ☐ LIVEGRANDMONACOGAMING.ORG \$6.99/yr SAVE!
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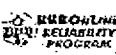
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WHOIS
Search Results for: **GRANDMONACOHOST.COM**

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOHOST.COM
Created on: 13-Apr-06
Expires on: 13-Apr-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK25.SECURESERVER.NET
PARK26.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ GRANDMONACOHOST.NET \$8.99/yr
- ☐ GRANDMONACOHOST.ORG \$8.99/yr
- ☐ GRANDMONACOHOST.RFQ \$8.99/yr SAVE!
- ☐ GRANDMONACOHOST.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOHOST.US \$7.99/yr
- ☐ GRANDMONACOHOST.NAME \$9.99/yr
- ☐ You might also consider:
 - ☐ GRANDMONACOHOSTONLINE \$8.99/yr E.COM
 - ☐ ONLINEGRANDMONACOHOST \$8.99/yr T.COM
 - ☐ GRANDMONACOHOSTHOME \$8.99/yr NET
 - ☐ HOMEGRANDMONACOHOST \$8.99/yr NET
 - ☐ GRANDMONACOHOSTSITE \$8.99/yr ORG
 - ☐ SITEGRANDMONACOHOST \$8.99/yr ORG
 - ☐ GRANDMONACOHOSTWEB \$9.99/yr SAVE! RFQ
 - ☐ WEBGRANDMONACOHOST \$9.99/yr SAVE! RFQ
 - ☐ GRANDMONACOHOSTLIVE \$6.99/yr SAVE! BIZ
 - ☐ LIVEGRANDMONACOHOST \$6.99/yr SAVE! BIZ
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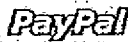
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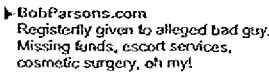


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WHOIS

Search Results for: **GRANDMONACOHOSTS.COM**

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 berkeley square
London, w1j 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOHOSTS.COM
Created on: 13-Apr-06
Expires on: 13-Apr-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 berkeley square
London, w1j 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK25.SECURESERVER.NET
PARK26.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ GRANDMONACOHOSTS.NET \$8.99/yr
- ☐ GRANDMONACOHOSTS.ORG \$8.99/yr
- ☐ GRANDMONACOHOSTS \$0.99/yr SAVE! INFO
- ☐ GRANDMONACOHOSTS.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOHOSTS.US \$7.99/yr
- ☐ GRANDMONACOHOSTS \$9.99/yr NAME
- ☐ GRANDMONACOHOSTSONLINE \$8.99/yr NEI.COM
- ☐ ONLINEGRANDMONACOHOSTS \$8.99/yr TS.COM
- ☐ GRANDMONACOHOSTS4HOME \$6.99/yr NET
- ☐ HOMEGRANDMONACOHOSTS \$8.99/yr NET
- ☐ GRANDMONACOHOSTSSITE \$8.99/yr ORG
- ☐ SITEGRANDMONACOHOSTS \$8.99/yr ORG
- ☐ GRANDMONACOHOSTSWEB \$0.99/yr SAVE! INFO
- ☐ WEBGRANDMONACOHOSTS \$0.99/yr SAVE! INFO
- ☐ GRANDMONACOHOSTSLIVE \$6.99/yr SAVE! BIZ
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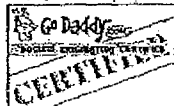
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WHOIS
Search Results for: **GRANDMONACOSLOTS.COM**

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Lucan Toh
46 Berkeley Square
London, London W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOSLOTS.COM
Created on: 03-Jan-06
Expires on: 03-Jan-08
Last Updated on: 03-Jan-07

Administrative Contact:
Toh, Lucan Calan.Horsman@playshare.com
46 Berkeley Square
London, London W1J 5AT
United Kingdom
2075984064

Technical Contact:
Toh, Lucan Calan.Horsman@playshare.com
46 Berkeley Square
London, London W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

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- ☐ GRANDMONACOSLOTS.NET \$8.99/yr
- ☐ GRANDMONACOSLOTS.ORG \$8.99/yr
- ☐ GRANDMONACOSLOTS. \$8.99/yr SAVE! INFO
- ☐ GRANDMONACOSLOTS.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACOSLOTS.US \$7.99/yr
- ☐ GRANDMONACOSLOTS. \$8.99/yr NAME
- ☐ GRANDMONACOSLOTS.SOUK \$8.99/yr ME.COM
- ☐ ONLINEGRANDMONACOSLOTS.COM \$8.99/yr TS.COM
- ☐ GRANDMONACOSLOTS.HOMEBIZ \$8.99/yr NET
- ☐ HOMEGRANDMONACOSLOTS \$8.99/yr NET
- ☐ GRANDMONACOSLOTS.SITE \$8.99/yr ORG
- ☐ SITEGRANDMONACOSLOTS \$8.99/yr ORG
- ☐ GRANDMONACOSLOTS.WEB \$8.99/yr SAVE! INFO
- ☐ WEBGRANDMONACOSLOTS \$8.99/yr SAVE! INFO
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Exhibit B-5

Internet Explorer - Trademark Explorer

http://mexpprd.questel.fr/trademarkexplorer.jsp?db=ALL

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Trademark Explorer - Recherche

Résultat de ma recherche

Menu Principal Recherche **Résultat** Mesession Déconnexion Aide

Recherche : (LUCAN ET TOU)/OWW

Voir les documents

Historique

Pré-visualiser le coût

Tout sélectionner Tout désélectionner

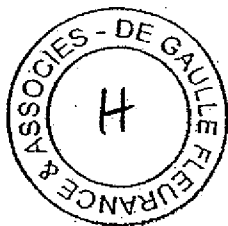
Bases de données	Réponses
<input type="checkbox"/> Marques allemandes	0
<input type="checkbox"/> Marques autrichiennes	0
<input type="checkbox"/> Marques du Bénélux	0
<input type="checkbox"/> Marques canadiennes	0
<input type="checkbox"/> Marques communautaires	0
<input type="checkbox"/> Marques danoises	0
<input type="checkbox"/> Marques espagnoles	0
<input type="checkbox"/> Marques d'état US (Service AvantIQ)	0
<input type="checkbox"/> Marques fédérales US	0
<input type="checkbox"/> Marques finlandaises (Service AvantIQ)	0
<input type="checkbox"/> Marques françaises	0
<input type="checkbox"/> Marques hongroises	0
<input type="checkbox"/> Marques internationales	0
<input type="checkbox"/> Marques italiennes	0
<input type="checkbox"/> Marques du Liechtenstein	0

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Internet 100%

15:02



Trademark Explorer - Recherche

http://www.questel-orbit.fr/sp/recherche.jsp?db=ALL

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Trademark Explorer - Recherche

Résultat de ma recherche

Menu Principal	Recherche	Résultat	Ma session	Déconnexion	Aide
<input type="checkbox"/>	Marques françaises	0			
<input type="checkbox"/>	Marques hongroises	0			
<input type="checkbox"/>	Marques internationales	0			
<input type="checkbox"/>	Marques italiennes	0			
<input type="checkbox"/>	Marques du Liechtenstein	0			
<input type="checkbox"/>	Marques lituanaises	0			
<input type="checkbox"/>	Marques mexicaines (Service AvantIQ)	0			
<input type="checkbox"/>	Marques monégasques	0			
<input type="checkbox"/>	Marques norvégiennes (Service AvantIQ)	0			
<input type="checkbox"/>	Marques polonaises	0			
<input type="checkbox"/>	Marques du Royaume Uni	0			
<input type="checkbox"/>	Marques suédoises	0			
<input type="checkbox"/>	Marques suisses	0			
<input type="checkbox"/>	Marques tchèques	0			
Nombre total de réponses:		0			

Coût de votre recherche : 1.00 EUR
Coût total de la session : 1.00 EUR

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Fiches techniques Informations sur les mises à jour

Internet 100%

démarrer

Recherche : (MAX ET WRIGHT)/OWW

Voir les documents

Tout sélectionner Tout désélectionner

Bases de données	Réponses
<input type="checkbox"/> Marques allemandes	0
<input type="checkbox"/> Marques autrichiennes	0
<input type="checkbox"/> Marques du Bénélux	0
<input type="checkbox"/> Marques canadiennes	0
<input type="checkbox"/> Marques communautaires	0
<input type="checkbox"/> Marques danoises	0
<input type="checkbox"/> Marques espagnoles	0
<input checked="" type="checkbox"/> Marques d'état US (Service AvantIQ)	1
<input type="checkbox"/> Marques fédérales US	0
<input type="checkbox"/> Marques finlandaises (Service AvantIQ)	0
<input type="checkbox"/> Marques françaises	0
<input type="checkbox"/> Marques hongroises	0
<input type="checkbox"/> Marques internationales	0
<input type="checkbox"/> Marques italiennes	0
<input type="checkbox"/> Marques du Liechtenstein	0
<input type="checkbox"/> Marques lituaniennes	0
<input type="checkbox"/> Marques mexicaines (Service AvantIQ)	0
<input type="checkbox"/> Marques monégasques	0
<input type="checkbox"/> Marques norvégiennes (Service AvantIQ)	0
<input type="checkbox"/> Marques polonaises	0
<input type="checkbox"/> Marques du Royaume Uni	0
<input type="checkbox"/> Marques suédoises	0
<input type="checkbox"/> Marques suisses	0
<input type="checkbox"/> Marques tchèques	0
Nombre total de réponses:	1

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PlayShare PLC Launches

New parent company of PokerShare & CasinoShare integrates its operating platform.

London, UK (PRWEB) October 12, 2006 – PlayShare.com (www.playshare.com) is the new integrated operating platform behind the world class poker and casino gaming sites PokerShare.com and CasinoShare.com. A UK public company, PlayShare is committed to providing the very best online experience, integrating two of their best-known sites so that the more you play the more you earn. PlayShare was created to develop these flourishing and unique gaming sites to the maximum, establishing a clear focal point for partners, customers, and investors alike.

This exciting new gaming platform gives back to its players like no other gaming site and with offices in five countries across three continents you know you are in good hands. Additionally, in light of recent US legislation passed by Congress on 30th September 2006, (Internet Gambling bill – Port Security bill), PlayShare wants customers to know that they are continuing to provide award winning poker and casino entertainment online – it's business as usual with no interruption of service to PlayShare's online casino or poker sites.

Players will benefit from a number of new and exciting products exclusive to the new platform such as a truly innovative rewards program with the most creative loyalty scheme in the industry. Enhancements are comprised of "beginners" tables which include "micro-limit tables," low buy-in tables, \$50/\$100 and \$100/\$200 tables. A common account and a shared purse offer players a unified experience – the intelligent choice for intelligent poker players.

Lucan Toh, CEO, PlayShare.com, explains that PlayShare.com offers an improved playing experience for Casino and Poker customers. It also means we now have a clear, centralized location from which to develop further unique and successful gaming sites. We're even more excited about what's planned for the next six months – stay tuned!"

For further information please contact
Melissa Ross
Lyceum Media
+44 (0)207 953 4026

About PlayShare.com

Using unparalleled, cutting-edge technology, PlayShare.com PLC is a public UK Company that owns and operates CasinoShare.com, PokerShare.com and MonkeyShare.net. Licensed by the Kahnawake Gaming Commission through its parent company, GameShare Limited, this is the brand new online gaming experience contributing more to its players than any other online gaming site.

###

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Microgaming Casino News

Microgaming News



PlayShare acquires Grand Gaming Group

ii

20 Nov 2006

PlayShare acquires Grand Gaming Group

ii

SOURCE: PlayShare and G3Partner

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The Palace Group

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Vegas Casino

Jackpot Factory

Casino Action Group

Golden Star Network

Trident Entertainment

On the 1st of November, 2006, PlayShare PLC acquired the Grand Gaming Group, which comprises Grand Monaco Casino and the G3 Partner affiliate program. Hailed in gaming circles as the two most watched groups, the merger is in line with the ambitions of PlayShare to be one of the top 5 gaming companies within the next two years.

About PlayShare

PlayShare PLC is a UK Public Company that owns and operates CasinoShare.com and PokerShare.com.

PlayShare has offices in 5 countries across 3 continents, ensuring unrivalled service to players and partners alike. PlayShare is licensed by the Kahnawake Gaming Commission through its parent company, GamShare Limited. All gaming products are powered by Microgaming "C the best in the business. They are committed to providing a trustworthy and secure gaming environment for all our customers.

CasinoShare offers new player 100% up to \$250 bonus and \$100 monthly bonus. More details about this casino please click here and review this casino.

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About Grand Gaming Group

G3 Partner is a Grand Gaming Group company. This group business people have years of marketing and casino operations experience both online and offline. This makes the Grand Gaming Group one of the most seasoned and talented companies in our industry.

Their management has worked for such land-based casino organizations as Harrah's Entertainment Company and Mirage Resorts. They want you to have the peace of mind that you are working with top industry professionals. They know how to treat casino customers because we have been doing it for years. Have confidence that your players are guaranteed a fun-filled gaming experience.

Grand Gaming Group comprises Grand Monaco Casino which offers new player 100% up to \$150 bonus. More details about this casino please click here and review this casino.

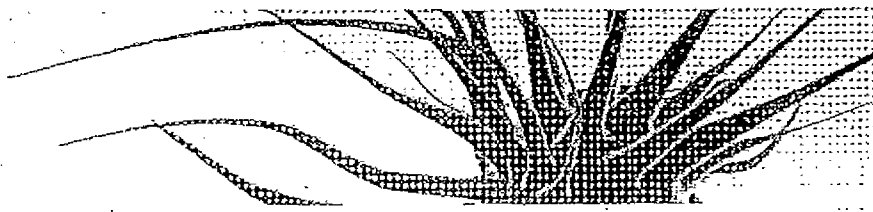
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Figure 1

IGAMING NEWS

Doyle's Room Folds
US Hand Post-UIGEA
Online poker room will
close its doors to US
players from March 1

**VIP Lounge Casino
Receives eCOGRA
Approval**
Jackpot Factory's VIP
Lounge Casino
achieves eCOGRA Play
it Safe seal

Betfair in heated battle over Australia's anti-gambling laws
Online gaming group files claim against Australian High Court

Neteller Announces Job Losses

Mobenga Awarded with NordicBet Contract
Mobile gaming provider wins contract with NordicBet

PlayShare Players to Experience Oneness

14-09-06

September 14, 2006 (London, UK) ~ PlayShare Ltd is looking to offer everyone who plays on its sites the true experience of oneness. Before the end of the year, the company plans to introduce the one wallet solution which will offer players a totally seamless gaming experience between its CasinoShare and PokerShare sites.

Players who want to enjoy the excitement of both sites, but don't want to have to log out of one site and into the other to play different games or to check on their balance, will be able to switch easily between games and between sites.

This seamless integration of the poker and casino platforms will not only make gaming so much easier but will also allow players to benefit from a variety of bonus systems that operate on both sites. Players will also gain significantly from the CasinoShare loyalty system by being able to hop easily between the sites.

Max Wright, Director, PokerShare.com/CasinoShare.com says: "With 24hr support, top-level security, and convenient payment and withdrawal options, CasinoShare has always offered players a world-class casino that delivers a truly exceptional mixture of excitement and fun. CasinoShare provides the most exciting online casino experience available and is a perfect partner to the already, hugely successful PokerShare."

He adds: "And now it's about to get a whole lot better. The one wallet system will make both our sites incredibly easy to use and move around and, will offer our players a genuine zen-like experience, because oneness is zen. When this system is in place, players will be able to concentrate fully on enjoying themselves and not waste valuable time logging into and out of sites to switch games or check balances. It's going to take playing on our sites to a whole new level."

There are over 300 games to choose from at CasinoShare.com with some of the biggest progressive jackpots to be found on the net. Visitors to the CasinoShare website can take advantage of an attractive sign-up offer currently on offer and ultimately enjoy a unique rewards program, which will be the first of its kind in the online casino industry. CasinoShare.com offers players trips to land-based casinos (in Las Vegas, Atlantic City, Monte Carlo, Macau, London & also Casino Cruises). Players will enjoy complimentary accommodation in some of the best casino hotels in the world. Additionally, CasinoShare's rewards team are on hand to provide show tickets, dinner, golf and spa reservations.

ENDS

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About PlayShare.com

PlayShare.com is the driving force behind the brands PokerShare.com, CasinoShare.com and MonkeyShare.net. PlayShare PLC is a UK company and the owner of GamShare Ltd, a Gibraltar-based gaming operator, licensed in Kahnawake, Canada.

About PokerShace.com

Poker Share is the first poker site in the world to offer its players the opportunity to share in its success, through the Poker Share Trust. The trust has the ultimate benefit of 40% ownership of PokerShare.com. It receives cash every month which is used to reward players through the Poker Share Trust Loyalty Store. What's more, if PokerShare.com floats on the stock exchange or is bought by another company, the players are rewarded.

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Gambit on Innovation
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21-02-07
Bill Mummery Takes on New Role in Private Sector
 Head of E-Gaming at Isle of Man DTI
 Takes up New Opportunity in the Private Sector

15-02-07
GemScope: First Personalised
Mobile Scratch Card Launches
WinOne launches GemScope at 3GSM
World Congress, Barcelona

13-02-07
5th European Casino Affiliate
Convention Held May 3-5
CAC2007 Amsterdam is expected to be
larger than any previous year



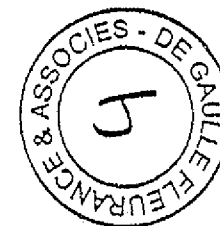
Depending on the total number of share points accumulated, players will receive cash from the Poker Share Trust.

About CasinoShare.com

CasinoShare.com is owned and operated by GamShare Ltd and is powered by Isle of Man based Microgaming.

PokerShare.com and CasinoShare.com are operated by Playit Ownit Ltd and licensed by the Kahnawake Gaming Commission through its parent company, GamShare Ltd. Both GamShare Ltd and Playit Ownit Ltd are based in Gibraltar.

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WIPO CASES FOR « LA SOCIETE DES BAINS DE MER »

	Case number	Complainant	Respondent	Domain names	Decision
1	D2000-1315	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Britannia Finance	monacocasinos.com montecarlocasinos.net thecasinomontecarlo.com themontecarlocasino.com	Transfer
2	D2000-1316	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Thomas Proud	casinodemonaco.com	Transfer
3	D2000-1317	Société des Bains de Mer et du Cercle des Etrangers à Monaco	Internet Marketing Associates	casinomonaco.com	Transfer
4	D2000-1318	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Martini BT	casino-monaco.com	Complaint denied
5	D2000-1319	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Joaquin Edo	casinomonaco.net	Transfer
6	D2000-1320	La Société des Bains de Mer	Gest Trading S.R.L.	casino-montecarlo.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		et du Cercle des Etrangers à Monaco			
7	D2000-1321	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Worldnet Companies inc.	casino-monte-carlo.net	Transfer
8	D2000-1322	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Externet World Inc.	montecarlo-casino.net montecarlo-casino.org	Transfer
9	D2000-1323	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	I. Bancorp Europe	casinosmontecarlo.com e-montecarlocasino.com monte-carlo-casino.com montecarlo-casino.com montecarlocasino.net montecarlocasino.org	Transfer
10	D2000-1324	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Iggi Networks Media Group	casinodemonaco.net casinoofmonaco.com	Transfer
11	D2000-1325	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Integroweb (Bahamas) Ltd.	casino-of-monaco.com casino-of-montecarlo.com	Transfer
12	D2000-1326	La Société des Bains de Mer et du Cercle	International Lotteries	casinomontecarlo.com montecarlocasinos.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		des Etrangers à Monaco			
13	D2000-1327	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	International Lotteries	casinodemontecarlo.com casinomonte-carlo.com casinomontecarlo.net casinomontecarlo.org e-casinomontecarlo.com lecasinodemontecarlo.com lecasinomontecarlo.com lemontecarlocasino.com monte-carlocasino.com montecarlogambling.com	Transfer
14	D2000-1328	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	International Services Inc.	casinodemontecarlo.net casino-montecarlo.net casinomonte-carlo.net casinomontecarloonline.com casinomonte-carlo.org casinosmontecarlo.net casinosmontecarlo.org ecasinomontecarlo.com e-casinomontecarlo.net ecasinomontecarlo.net emontecarlocasino.com e-montecarlocasino.net emontecarlocasino.net lemontecarlocasino.net livemonacocasino.com monacogaming.com monacogaming.net monte-carlocasino.net montecarlocasinoonline.com montecarlocasinoonline.net	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
				montecarlogambling.net montecarlogames.com montecarlogames.net montecarlojackpot.com montecarlojackpot.net montecarloonlinecasino.com montecarloonlinecasino.net sexcasinomontecarlo.com sexymontecarlocasino.com sexymontecarlocasino.net webcasinomontecarlo.com	
15	D2000-1329	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Casino On-Line	monacocasino.com	Transfer
16	D2000-1330	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Netrider	monaco-casino.com	Transfer
17	D2000-1331	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	World Casino Company	monacocasino.net	Transfer
18	D2000-1332	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Global Productions – Domain for Sale	monacogambling.com	Transfer
19	D2000-1333	La Société des	Piranha	montecarlocasino.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		Bains de Mer et du Cercle des Etrangers à Monaco	Interactive Ltd.		
20	D 2003-0985	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Internet Billions Domains Inc.	casinomontecarlo.org e-casinomontecarlo.com lecasinodemontecarlo.com monte-carlocasino.com montecarlocasinos.net sexcasinomontecarlo.com sexcasinomontecarlo.net sexymontecarlocasino.com sexymontecarlocasino.net thecasinomontecarlo.com	Transfer
21	D2004-0454	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	BestCreative	montecarlo-casinos.com	Transfer
22	D2004-0415	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Aucun	monte-carlocasinos.net monte-carlogrand.com montecarloroyale.com monte-carlosuncasino.com montecarlosuncasino.com suncasino-monte-carlo.com suncasino-montecarlo.com	Transfer
23	D2005-0225	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Montecarlo Development, LLC.	montecarlocasinoandsportsbook.com	Transfer
24	D2005-0338	La Société des	Montecarlo	montecarlo-onlinecasino.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		Bains de Mer et du Cercle des Etrangers à Monaco	Online Casino (MOC)		
25	D2005-0339	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Netsymmetrics	online-casinos-montecarlo.com online-casino-montecarlo.com	Transfer
26	D2005-0403			casinobestmontecarlo.com	Terminated : amicable transfer
27	D2005-0404	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Integrity Ltd.	luckymontecarlocasino.com	Transfer
28	D2005-0439			montecarlohotelandcasino.com	Terminated : amicable transfer
29	D2005-0440			montecarlocasinohotel.com montecarloéasinovegas.com	Terminated : amicable transfer
30	D2005-0526	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	LaPorte Holdings, LLC	montecarloresortandcasino.com	Transfer
31	D2005-0527	La Société des Bains de Mer et du Cercle des Etrangers	Domain Active Pty. Ltd	montecarloresortcasino.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		à Monaco			
32	D2005-1342	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Corril Holding	montecarlograndcasino.com grandcasinomontecarlo.com	Transfer
33	D2005-1343	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Michael Diturisi	montecarlointernationalcasino.com	Transfer
34	D2006-0289	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Empire Online Ltd	monacogoldcasino.com	Transfer
35	D2006-1245	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Mark Bolet	monaconetcasino.com	Transfer

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At Grand Monaco, you can be confident you are playing in a world class casino with world class service. Below you will find some of the benefits we offer our players.

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[How to become a member](#)

[How to earn rewards](#)

[Redeem your rewards](#)

[Special Bonuses](#)

[Points Expiration](#)

The Benefits

You receive many valuable benefits including:

- **FREE membership**
- Automatic point earnings and cash back services
- Belong to the Grand Gaming Group
- Earn valuable G3 Points for our Cash Back Rewards program
- Tiered slot bonus rewards
- Earn comps, cash, and offers based on play
- Weekly G3 Point multiplier days
- Exclusive personalized promotions and invitations
- **It's simple but rewarding!**

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How to become a member

Membership to the G3 Players Club is FREE and given to all Grand Monaco players for registering a real player account.

Your membership account number = Your real casino account number

Your membership password = Your real casino password

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How to earn G3 Cash Back rewards

- After registering and making your first purchase at Grand Monaco, your membership includes 2,000 G3 Points for free.
- A further 5,000 FREE points are yours by making ANY first webwallet purchase of \$50 or more.
- Additional G3 Points are earned every time you make a bet.
- The more you play, the faster you earn G3 Points.
- Various promotions offer G3 Points to players.
- Grand Monaco rewards slot players with additional Bonus G3 Points based on the Slot Tier Level achieved each month.

Points calculation

G3 Points may be redeemed in units of 5,000 where 5,000 points = \$5.00 Casino Bonus credits.

Amount Wagered	Points Earned	Games
\$1	1 point	Slots, Keno, Scratch Games
\$3	1 point	ALL other games

How to redeem your G3 points

Grand Monaco delivers world class service, so we made it easy for players to get their well deserved rewards - *fast*.

Redeem your G3 Points easily:

1. Players can redeem G3 Points into Casino Bonus Credits at any time by following these easy steps:



Click on any of the G3 Rewards Club links in the casino software



G3 Points are redeemed and deposited in the form of Bonus Credits into your casino bonus account. You can use these credits in the casino or cash them out in accordance with the bonus system requirements.

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Special bonuses

1. Monthly slot bonuses

At Grand Monaco we have something extra special for our slot players:

- You qualify for additional MONTHLY bonuses depending on your Slot Bonus Status Level determined from the previous month's slot play.
 - This bonus level and additional bonus points are recalculated every month based on the previous month's slot wagering activity.
- See chart below.

Slots monthly bonus levels

Level	Monthly Slot	Additional Bonus
-------	--------------	------------------

Member	Wagering	
	0 – \$5,000	-
Silver	\$5,001 – \$25,000	10%
Gold	\$25,001 – \$50,000	15%
Platinum	\$50,001 – \$75,000	20%
Diamond	\$75,001 and up	25%

How it works:

Month	Amount Wagered	Additional bonus player qualifies for:	Additional Bonus G3 Points
			+ Base G3Points:
1	\$50,000	Gold Level - 15%	+ 50,000 pts
2	\$25,000	Silver Level - 10%	15% bonus x 25,000 = 3,750 + 25,000 pts
3	\$5,000	No bonus Level	10% bonus x 5,000 = 500 + 5,000 pts
4	\$15,000	Silver Level - 10%	No bonus added + 15,000 pts

(Remember: \$1 slot wagered = 1 point)

Explanation:

- A Player wagers a total of \$50,000 on Slots in Month 1.
- The Player will qualify for additional Slot Bonus in Month 2 based on the \$50,000 wagered in month 1.
- The Level qualified for is **Gold Level**, which earns an additional 15% bonus on **SLOTS** play in Month 2.
- If the player wagers \$25,000 on Slots in Month 2, then he gets a slot bonus of 3,750 (\$25,000 x 15%).
- This slot bonus is added automatically in his Bonus Account at the end of Month 2.

2. Other regular bonuses

For ALL players, the G3 Rewards Club offers the following special privileges:

- Regular purchase match offers
- Regular mailings with special offers
- Birthday bonus offers
- Special banking services
- Higher bonus offers
- Gifts and other very special treatments
- Casino tournament invitations
- Discretionary bonuses by casino management

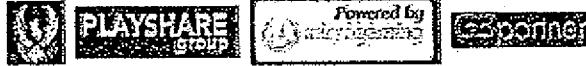
All purchase match offers require players to use our "Claim your Bonus" redemption process. A player can claim a bonus ANY time after receiving an invitation. All free money credits are automatically deposited into the player's casino Bonus Account in accordance with the specific promotion terms and after the offer requirements have been met and bonus claimed.

Points expiry

G3 Points expire after 6 calendar months of being issued.

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Grand Monaco is a Hillstead Limited, Gibraltar site - now a member of the PlayShare group
Grand Monaco is in NO way associated with the Principality of Monaco, nor ANY of the
land-based casino operations located in that jurisdiction. Grand Monaco is an independent operation.

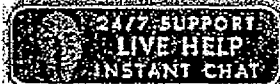
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HOW TO WITHDRAW

Well Done. You're a winner and now we promise to process your cash-in as quickly as possible.

To make a withdrawal follow the steps:

- Login to your Grand Monaco account
- Click on the Bank button
- Click on the Withdrawal button
- Enter the amount you wish to withdraw in the box.

You can now check the status of your withdrawals at any time by clicking on the Cashcheck icon in the casino software.



Please note that the minimum withdrawal amount is \$50.00.

You can reverse a withdrawal (or portion there-of) back to your gaming account within 24 hours after you've requested your original withdrawal. Simply click the REVERSE WITHDRAWAL TAB in the casino software. Your withdrawal is sent to our processing department after the 24 hour reverse withdrawal period has elapsed. You are notified by Email once your Cash Out Request has been completed and the funds have been transferred to you.

It is our policy to refund withdrawals to the same account or mechanism that the original purchase was made, up to the value of your original deposits. However, not all purchase mechanisms facilitate refunds of cash withdrawals and in such cases balances will be paid to the payment option of YOUR choice (see **Withdrawal Options**).

Please note: When a customer makes their first cash-in, a large withdrawal or changes to payment options, Grand Monaco reserves the right to use security measures to ensure you are the rightful recipient of the funds. This is for casino player protection and may require you to send documentation (utility bills, copy of ID, Copy of credit card used to effect purchases). We may ask you sign a list of your previous purchases to your Grand Monaco Account. Again, these measures protect your money and your privacy, but may result in small delays of receiving your money. We apologize for any inconvenience this may cause and will make every attempt to keep the process short.

Should you have any queries about the status of your cash out, please contact one of our **Customer Support** agents.



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[Where did I download the file to?](#)
[What is the installation file called?](#)
[What are the minimum system requirements?](#)

How do I download the free casino software?

Click on any 'Download' button that appears on every page. This will start the process explained on the download page you arrive at.

What do I do once the download is complete?

The File Download dialogue box will launch and guide you through the installation process. Follow the prompts by clicking "Next >" when requested and the casino software will install.

If you are using Firefox or a browser other than Microsoft Internet Explorer, then the setup file would have been downloaded to the location that you selected. To install the Grand Monaco software, double-click on the setup file you downloaded. The install Wizard will guide you through the installation process. Follow the prompts by clicking "Next >" when requested and the casino software will install.

Where did I download the file to?

The default location is to your desktop. If you saved the casino software to an alternative location and cannot find it, simply follow these instructions: Click on 'Start' / 'Find' / 'Find files or folders'. Type GrandMonaco_0Game_W3.exe in the 'Name' field, and click on 'Find now'. Remember to search by using the 'Local hard drives' option. Once you have found the casino software, double-click to begin the installation.

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What is the installation file called?

GrandMonaco_0Game_W3.exe

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What are the minimum system requirements?

Pentium II 333 Mhz
32 Bit operating system Windows 95/98/2000/NT/ME/XP
32 MB RAM
25 MB available hard drive space
Internet connection

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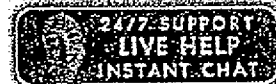


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Read more about our industry leading casino offers below.



Claim your Opening Offer Bonus and Casino Kit

Come back to this page once you have made your first deposit and met the 1x wagering requirements. Enter your name, e-mail address and Real Account number and submit.

Your Name

Your E-mail Address

Real Acct. Number
e.g. vgm00095764

Very Important:

By claiming the Opening Offer, you agree to the **terms and conditions**. The Opening Offer is provided to first time players to enhance the gaming experience with increased gaming time. Attempts to take advantage of bonuses beyond this spirit may be deemed as **promotion abuse**.

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100% Slot Match Bonus up to \$150 FREE

OR

100% Casino Game Match Bonus up to \$75 FREE

Download our FREE software,
register an account, and make a Deposit

step

1



step

2

Choose your Bonus by
wagering your deposit once
(1 X) on the games of your choice



Slots Only

OR



Casino Games

step

3

Claim your Opening Offer
We match your deposit by 100% up to:

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OR

\$75 in FREE bonus credits if your deposit was
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The opening offer bonus is credited to your bonus account in less than 4 hours from the time you've met the conditions and claimed your offer.

Remember:

- Our conditions require you to wager the original purchase one time to determine whether you are accepting the slot or games offer.
- Cashing in prior to receiving your 100% bonus match credits forfeits the free credits.
- If you wager on a mix of slots and casino games, then you have accepted the casino game offer of up to \$75 Free.
- After receiving your opening offer free credits, you may not cash-in until you have met the minimum bets and wagering requirements.

[Click here](#) to see the Opening Offer Terms & Conditions detail.

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The Casino Kit includes:

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2. FREE Membership into the G3 Rewards Club - No Registration Required!
3. FREE Subscription to our monthly newsletter - *Grand News*
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Grand Monaco offers all new purchasing players the chance to try world-class gaming with a world-class welcome!

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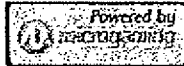
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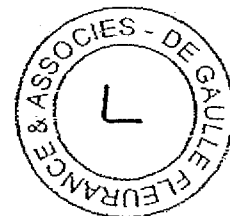
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[Health Care](#)
[Vitamins](#)
[Contact Lenses](#)
[Laser Eye Surgery](#)
[Cosmetic Surgery](#)
[Diet](#)

[Lifestyle](#)
[Fitness](#)
[Dating](#)
[Singles](#)
[Education](#)
[Degrees](#)

[Legal Help](#)
[DUI Lawyers](#)
[Accident Lawyers](#)
[Bankruptcy Lawyers](#)
[Probate Lawyers](#)
[Patent Lawyers](#)

[Shopping](#)
[Gifts](#)
[Flowers](#)
[DVD Rental](#)
[Apparel](#)
[Books](#)

Exhibit C-1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
SOCIETE DES BAINS DE MER ET DU :
CERCLE DES ETRANGERS A :
MONACO, :

Plaintiff, :

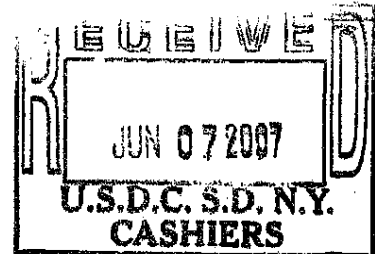
vs. :

PLAYSHARE PLC, GRAND :
MONACO LTD., GAMSHARE (UK) :
LTD., LUCAN TOH, MAXWELL :
WRIGHT, HILSTEAD LTD., :

Defendants. :
-----x

Case No. 07 Civ. 4802

DEMAND FOR JURY TRIAL



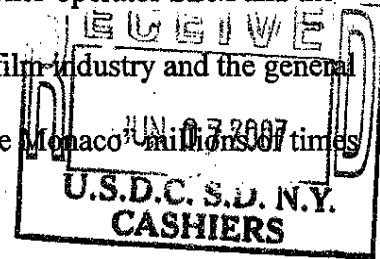
AMENDED COMPLAINT

Plaintiff Société des Bains de Mer et du Cercle des Etrangers à Monaco ("SBM" or "Plaintiff"), by its attorneys Quinn Emanuel Urquhart Oliver & Hedges LLP, for its Complaint against Defendants PlayShare PLC, Grand Monaco Ltd., GamShare (UK) Ltd., Lucan Toh, Maxwell Wright, and Hilstead Ltd. (collectively, "Defendants"), alleges as follows:

PRELIMINARY STATEMENT

1. This action arises from Defendants' attempt to attract customers to its gambling websites by willfully and blatantly trading off the goodwill associated with the world-renowned Monaco casinos that SBM has developed through enormous effort and financial investment over a time period spanning more than a century. SBM is the founder and manager of four Monaco casinos, including the Casino de Monte-Carlo, which has been in operation since April 2, 1863. Under express decree from the authorities of the Principauté of Monaco, SBM enjoys a monopoly for casino and gaming industries within the territory of the Principauté of Monaco and

is therefore the sole company that can organize games and gambling in Monaco. As a result of SBM's efforts spanning over more than a century, the Casino de Monte-Carlo — the oldest of the four casinos owned and operated by SBM in Monaco — is famous and known the world over as one of the preeminent casinos in the world. SBM actively promotes its four Monaco-based casinos, particularly the Casino de Monte-Carlo, throughout the world and in the United States. Due to SBM's substantial investments, consumers perceive the terms "Monaco" or "Monte Carlo" in connection with casino services as identifiers of casino owner-operator SBM and the Principauté of Monaco. Indeed, the print and broadcast media, the film industry and the general public have used the terms "Casino de Monte-Carlo" and "Casino de Monaco" millions of times when referring to SBM's casinos.



2. Notwithstanding these facts, and undeniably because of these facts, Defendants have attempted to trade upon the enormous goodwill and brand equity associated with SBM's casinos by registering and using at least 66 domain names that employ the term "Monaco" to operate gambling-related websites. Defendants' Grand Monaco Casino websites (the "Grand Monaco Casino") and its gambling software — which may be downloaded free of charge — prominently feature the designations GRAND MONACO CASINO and GRAND MONACO. Defendants' GRAND MONACO CASINO and GRAND MONACO designations undoubtedly cause consumers to mistakenly believe SBM sponsors, endorses, or is affiliated with Defendants' websites. Moreover, Defendants' incorporation of the term "Grand" and a "crest" design in connection with the term "Monaco"—both of which have connotations of royalty—further exacerbates the likelihood for consumer confusion.

3. Defendants have deliberately infringed and diluted SBM's invaluable rights in its trademarks and brand equity through the registration, maintenance and use of Internet domain

names that are confusingly similar to SBM's marks, and by prominently featuring the confusingly similar GRAND MONACO CASINO and GRAND MONACO designations throughout their websites and gambling software in order to attract consumers to Defendants' websites and to create a caché that the sites would otherwise not possess. As Maxwell Wright—owner of the majority of domain names at issue in this action and Director and Chief Executive Officer of Defendant PlayShare—conceded in his submission to the World Intellectual Property Organization ("WIPO") in a related proceeding between SBM, Toh, and Wright, Defendants are "seeking to get some of the lustre of Monaco by incorporating the word in our name."

4. Plaintiff seeks damages and permanent injunctive relief for Defendants' acts of unfair competition, trademark infringement, trademark dilution, cyber squatting, and related claims under federal and New York statutory and common law to prevent Defendants' continued fostering of an injurious false identification and association between Defendants and SBM and further co-opting of the goodwill and reputation of SBM's famous and valuable trademark rights.

THE PARTIES

5. Plaintiff SBM is a société anonyme organized and existing under the laws of the Principauté of Monaco, enrolled with the registry of companies of Monaco under number 56 S 00523, with a principal place of business at Place du Casino, Monte Carlo MC 98000 Monaco, Principauté de Monaco. SBM has an additional place of business, operated in conjunction with the Principauté de Monaco, located at 565 Fifth Avenue, New York, New York 10017.

6. Upon information and belief, Defendant PlayShare PLC ("PlayShare") is a public limited company organized under the laws of the United Kingdom with its principal place of business at 7 Queen Street, Mayfair, London W1J 5PB, UK. Upon information and belief, PlayShare is the parent company of GamShare (UK) Limited and Grand Monaco Limited.

7. Upon information and belief, Defendant Grand Monaco Limited (“Grand Monaco”) is a private limited company organized under the laws of the United Kingdom with its principal place of business at 7 Queen Street, Mayfair, London W1J 5PB, UK. Upon information and belief, Grand Monaco is a subsidiary of PlayShare PLC.

8. Upon information and belief, Defendant GamShare (UK) Limited (“GamShare”) is a private limited company organized under the laws of the United Kingdom with its principal place of business at 7 Queen Street, Mayfair, London W1J 5PB, UK. Upon information and belief, GamShare is a gaming operator, licensed in Kahnawake, Canada. Upon information and belief, GamShare is a subsidiary of PlayShare.

9. Upon information and belief, Defendant Lucan Toh (“Toh”) is a Director of PlayShare and a resident of London, England. Toh is the registered owner of domain names through which Defendants operate the Grand Monaco Casino.

10. Upon information and belief, Defendant Maxwell Wright (“Wright”) is a Director and the Chief Executive Officer (“CEO”) of PlayShare, and a resident of London, England. Wright is the registered owner of domain names through which Defendants operate the Grand Monaco Casino.

11. Upon information and belief, Defendant Hilstead Limited (“Hilstead”) is a company organized under the laws of the United Kingdom with its principal place of business at Mezzanine West, Hadfield House, Library Street, Gibraltar. Upon information and belief, Hilstead is a subsidiary of Grand Monaco that handles, at least in part, the financial transactions for the Grand Monaco Casino.

12. Upon information and belief, through their ownership of domains names set forth *infra* in ¶ 32 and control over Playshare, Toh and Wright have caused PlayShare to operate the

Grand Monaco Casino. Upon information and belief, Toh and Wright have caused subsidiaries of PlayShare, including Grand Monaco, GamShare, and Hilstead to aid in the advertising and promotion of the Grand Monaco Casino.

JURISDICTION AND VENUE

13. Plaintiff brings this action for federal unfair competition in violation of Section 43(a) of the Trademark Act of 1946, as amended (the "Lanham Act"), 15 U.S.C. § 1125(a); federal trademark infringement in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1); federal cyber squatting under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1); deceptive acts and practices in violation of Section 349(h) of the New York General Business Law; false advertising in violation of Section 350-e(3) of the New York General Business Law; injury to business reputation and trademark dilution in violation of Section 360-l of the New York General Business Law; and trademark infringement and unfair competition in violation of the common laws of the State of New York and of the several states of the United States.

14. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331, 1338(a) and 1338(b). This Court has supplemental jurisdiction over all other claims asserted herein under 28 U.S.C. § 1367(a).

15. This Court has personal jurisdiction over Defendants under New York Civil Practice Law and Rules § 302 by virtue of their transacting business and/or contracting to supply goods or services in the State of New York, their commission of tortious conduct as described herein within the State of New York, and their commission of tortious conduct as described herein outside the State of New York, causing injury to Plaintiff within the State of New York,

with the actual or reasonable expectation that said conduct will have consequences in the State of New York, and Defendants' deriving substantial revenue from interstate commerce.

16. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b) and 1391(c).

THE BUSINESS OF PLAINTIFF SBM

17. The Principauté de Monaco ("Monaco") is a constitutional monarchy located on a small piece of land, which is divided into four quarters. The most well-known of these quarters is undoubtedly Monte Carlo. It is so well-known, in fact, that it is common for the public to use the terms Monaco and Monte Carlo interchangeably.

18. Monaco is known worldwide for, among other things, SBM's four high quality casinos, including the Casino de Monte-Carlo—one of Monaco's most famous and enduring symbols. SBM's empire of casinos is a venerable and important body within the international gaming and resort industry. The esteem held for SBM's casinos is based on its worldwide reputation for excellence and quality, and the terms "Monaco" and "Monte Carlo," when used in connection with gaming services, embody a tremendous amount of goodwill that inures to SBM. Because of the correlation between Monaco and Monte Carlo in the public's mind and the fame of SBM's Monaco-based casinos, to the average American consumer use of either the CASINO DE MONTE-CARLO mark or CASINO DE MONACO mark generates an association with SBM's famous casinos in Monaco.

19. Since April 2, 1863, SBM has enjoyed a government-granted monopoly over the casino and gaming industries for the territory of Monaco, and is therefore the sole company that can organize games and gambling in Monaco. A true and correct copy of the Privilège des Jeux, renewed for the last time by the Ordonnance Souveraine no. 15-732 of March 13, 2003, is

attached hereto as Exhibit A. As indicated in Exhibit A, SBM will retain the exclusive right to conduct casino gaming within Monaco until at least April 1, 2027.

20. SBM is the owner of United States Trademark Registration No. 3,031,006, dated December 20, 2005, for the mark CASINO DE MONACO for use in connection with, *inter alia*, computerized video games for gaming purposes, gaming equipment, software and hardware for use in gaming machines, computer game software, computer ecommerce software to allow users to perform electronic business transactions via a global computer network, and providing casino services within a hotel environment. A true and correct copy of Registration No. 3,031,006 is attached hereto as Exhibit B. SBM is also the owner of Registration No. 02.23234 for the mark CASINO DE MONACO issued by the Monaco Trademark Office on September 30, 2002. A true and correct copy of Monaco Registration No. 02.23234 and a translation are attached hereto as Exhibit C.

21. Trademark Application Serial No. 76/479,351 for the mark CASINO DE MONTE-CARLO was filed by SBM on December 30, 2002 and is currently pending in the United States Patent and Trademark Office.

22. In addition to the aforementioned trademark registrations and application, SBM also owns over one hundred and fifty domain names incorporating its trademarks that it uses in connection with its gaming and casino-related goods and services, including, among others, <monaco-grand-casino.com>, <casinosdemonaco.com>, <livemonacocasino.com>, <monacogoldcasino.fr>, <monaco-casinos.com>, <monaco-casinos.net>, <monacobestcasino.com>, <casinosmonaco.com>, <casinomonacopoker.com>, <casinomontecarlo.com>, and <casino-monte-carlo.com>. SBM has previously enforced its

trademark rights against infringing domain name registrants in United States federal courts. In addition, SBM has obtained numerous domain name transfers from infringing registrants.

23. SBM actively and extensively advertises and promotes its Monaco-based casinos through various channels and media, including print media, film and the Internet, and uses the terms "Monaco" and "Monte-Carlo" to identify its casino-related goods and services. Though worldwide in its scope, a significant amount of this promotion is aimed at North American consumers. A substantial portion of SBM's multi-million dollar worldwide advertising and promotion budget is spent on marketing within the United States. Furthermore, for approximately twenty years, SBM has maintained an office in New York in conjunction with the Monaco tourism office for the purposes of promoting tourism in Monaco in general, as well as advertising SBM's Monaco-based casinos specifically. It also functions as an international sales office, from which consumers are able to book reservations for travel to Monaco.

24. Through its New York office, SBM promotes its casinos in the United States by participating in trade shows, advertising through the print and broadcast media, charity partnerships and participation, direct mail and telephone marketing, and sales to groups and individuals. Over ten thousand brochures advertising SBM's Monaco-based casinos are mailed out every year by SBM. Plaintiff also publishes and distributes its English-language publication "Société," dedicated to tourism in Monaco and the resorts owned by SBM, throughout North America.

25. This widespread marketing effort has reaped benefits. North Americans make up the single largest group of SBM clients. As of September 2000, twenty-two percent of SBM's customers were located in North America, followed by France and then Italy.

26. In addition to SBM's advertising and marketing efforts, the media and general public have frequently used the CASINO DE MONACO and CASINO DE MONTE-CARLO marks in connection with SBM — and such use by the media and public inures exclusively to the benefit of SBM. As a famed institution, the Casino de Monte-Carlo garners a significant amount of unsolicited attention from the media. Monaco and the Casino de Monte-Carlo are frequently the subjects of newspaper and magazine articles throughout the United States. In addition, numerous books have been written about Monaco and the Casino de Monte-Carlo. Moreover, at least ten motion pictures were filmed in or were based on the Casino de Monte-Carlo, including, without limitation, "Foolish Wives" (1922), "Monte Carlo" (1930), "The Man Who Broke the Bank in Monte-Carlo" (1935), "Charlie Chan at Monte Carlo" (1937), "The Red Shoes" (1948), "Loser Takes All" (1956), "Seven Thieves" (1960), "Kaleidoscope" (1966), "Never Say Never Again" (1983), and "GoldenEye" (1995).

27. As a result of SBM's long participation and leadership in the international gaming and resort industry, extensive advertising, and media attention over the MONACO and MONTE-CARLO designations for casino-related services and products, SBM would be irreparably harmed if it lost control over the ability to prevent unauthorized gaming sites from using such identifications for casino-related products or services.

DEFENDANTS' UNLAWFUL CONDUCT

28. Upon information and belief, Defendants operate several companies that provide marketing services to the online gambling industry in the form of both internet-based and non-internet-based advertising. This advertising is aimed at directing consumers to their Grand Monaco Casino websites, where consumers can download gambling software onto their computers and utilize online gambling services.

29. Upon information and belief, PlayShare is the parent company of several online gambling companies, including Grand Monaco, PokerShare.com, and CasinoShare.com, as well as the PlayShare Affiliates Program and G3 Partner Limited ("G3"). Upon information and belief, PlayShare is licensed by the Kahnawake Gaming Commission, which regulates and controls gaming and gaming related activities conducted within and from the Mohawk Territory of Kahnawake, Canada, through its subsidiary, GamShare. Upon information and belief, Wright is the Director of PlayShare subsidiaries PokerShare.com and CasinoShare.com. Upon information and belief, the PlayShare Affiliates Program and G3 are programs through which member third-parties receive a monthly commission from PlayShare based on revenues earned from gamblers referred by the member to PlayShare.

30. Upon information and belief, PlayShare acquired the Grand Gaming Group, including the Grand Monaco Casino and the G3 affiliate program that promotes it, effective November 1, 2006. Upon information and belief, such acquisition also included the domain names set forth *infra* in this Complaint.

31. Upon information and belief, the Grand Monaco Casino, as it currently exists, was launched in or around July 2006. According to Defendants' websites, the Grand Monaco Casino offers players 250 unique games and "innovative monthly promotions" in order to retain existing clientele and continually attract new players. Upon information and belief, Defendants have actively employed the GRAND MONACO CASINO and GRAND MONACO designations in their advertising and promotional campaigns and have advertised their online casino services nationwide, including in New York and this judicial District.

32. Defendants have also drawn consumer attention to their websites and casino services using a number of Monaco-related domain names. As part of that effort Defendants have registered, maintained, and used at least the following domain names:

grandmonaco.com	grandmonacomillions.org	grandmonacolotto.com
grandmonacocasino.com	grandmonacopoker.org	grandmonacolounge.com
casinograndmonaco.com	grandmonacopokerclub.org	grandmonacomahjong.com
deutschesgrandmonaco.com	grandmonacoracebook.org	grandmonacomillions.com
grandmonacoayda.com	pokergrandmonaco.org	grandmonaconews.com
grandmonacoayuda.com	grandmonacostore.com	grandmonacoonlinecasino.com
grandmonacobingo.com	grandmonacosupport.com	grandmonacoonlinegaming.com
grand-monaco.com	grandmonacovideopoker.com	grandmonacoonlinepoker.com
grand-monaco-casino.com	grandmonaco.net	grandmonacopartners.com
grand-monaco-poker.com	casinograndmonaco.net	grandmonacoplayersclub.com
grandmonacocasinoclub.com	grandmonacobingo.net	grandmonacopoker.com
grandmonacoclub.com	grandmonacocasino.net	grandmonacopokerclub.com
grandmonacocraps.com	grandmonacocasinoclub.net	grandmonacopromotions.com
grandmonacogames.com	grandmonacogames.net	grandmonacoracebook.com
grandmonacogaming.com	grandmonacogaming.net	grandmonacorewards.com
grandmonacohost.com	grandmonacolottery.net	grandmonacoskillgames.com
grandmonacohosts.com	grandmonacomillions.net	grandmonacoslots.com
grandmonacolottery.com	grandmonacoplayersclub.net	grandmonacosports.com
casinograndmonaco.org	grandmonacopoker.net	grandmonacosportsbook.com
grandmonacocasino.org	grandmonacopokerclub.net	grandmonacosports.net
grandmonaco.org	grandmonacoracebook.net	grandmonacosportsbook.net
grandmonacocasinoclub.org	grandmonacoskillgames.net	pokergrandmonaco.net

These domain names are collectively referred to herein as the "Monaco Domain Names."

33. Each of the Monaco Domain Names is not owned by a corporate entity, but to either Defendant Toh or Wright *personally*. This is no accident. Upon information and belief, at all relevant times Defendants Toh and Wright have used numerous corporate entities, including but not limited to PlayShare, GamShare, Grand Monaco, CasinoShare.com, PokerShare.com, Hilstead, G3, and the PlayShare Affiliate Program, as their alter egos; have dominated and

controlled the affairs of these corporations; and have employed these entities as their instrumentalities for the acts alleged herein.

34. Defendants use the Monaco Domain Names, as well as the GRAND MONACO CASINO and GRAND MONACO designations, to draw attention to and market their online casino websites. Defendants' websites, as well as their associated gaming components, prominently feature the GRAND MONACO CASINO and GRAND MONACO designations. As shown below, these websites also prominently feature a stylized rendition of those marks, including a mock royal "crest," enhancing the false suggestion that the designations are associated with Monaco and its royal family:



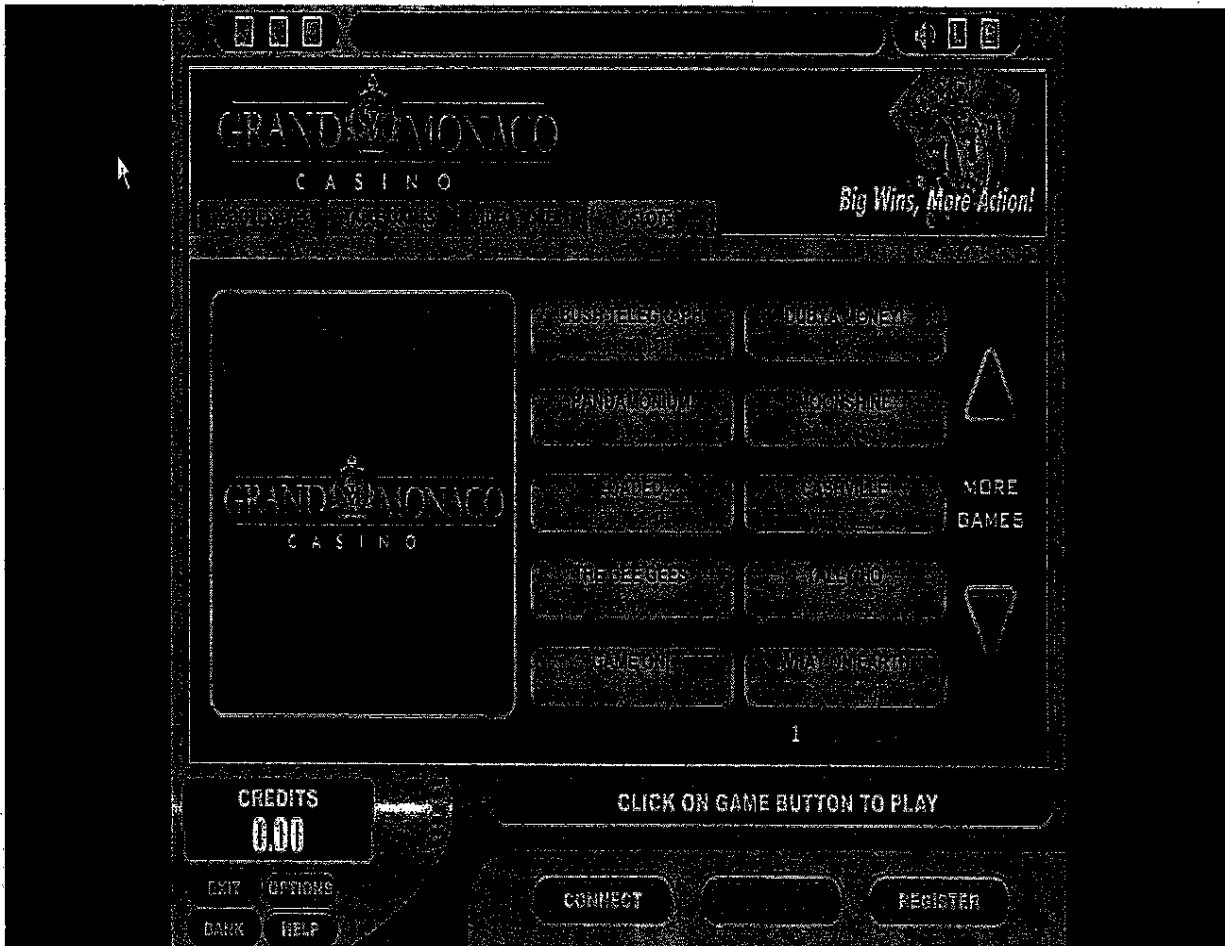
35. Defendants' online casino is currently in operation. The Monaco Domain Names resolve to websites with identical content, thereby creating numerous avenues through which consumers can access the Grand Monaco Casino.¹

On the home page of Defendants' websites, pictured above, consumers are invited to download

¹ Currently, the following Monaco Domain Names appear to have been parked: grand-monaco-poker.com; grandmonacopoker.org; grandmonacopokerclub.org; pokergrandmonaco.org; grandmonacopoker.net; grandmonacopokerclub.net; grandmonacoonlinepoker.com; grandmonacopoker.com; grandmonacopokerclub.com; and pokergrandmonaco.net.

gambling software. At the top of each page of Defendants' websites, the GRAND MONACO designation, coupled with the "crest" indicia, is prominently displayed.

36. Directly below the link to download the gambling software on the home page of Defendants' websites, pictured above, is an invitation to "PLAY INSTANT FLASH — NO DOWNLOAD REQUIRED." Upon clicking this link, the following screen is displayed:



As shown above, each of Defendants' "Instant Flash" games are offered in close proximity to the GRAND MONACO CASINO designation and stylized "crest."

37. The program available for download on Defendants' websites prominently features the GRAND MONACO stylized designation at the top of each gaming page, as shown below:

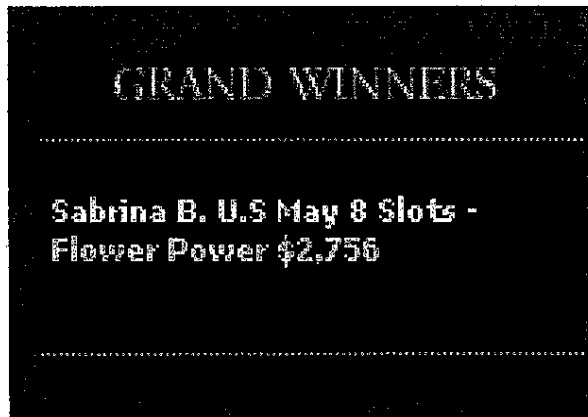


38. Upon information and belief, Defendants' websites, their associated downloadable casino program, and their "Instant Flash" gaming environment are accessible anywhere in the United States, including New York and this judicial District.

39. Defendants have targeted consumers within this judicial District for promotional campaigns intended to draw attention to PlayShare and its subsidiaries (which includes Grand Monaco). For example, on or about May 26, 2006, Defendants organized and heavily publicized a "gas giveaway" promotion that was, according to a PokerShare.com press release, "designed to help New Yorkers enjoy their Memorial Day Weekend without having to fret about the high price of gasoline." Defendants actively encouraged local radio personalities and media outlets to publicize the event, as well as their casino services, websites, and affiliate programs. The event

was held in this judicial District, at the corner of Canal Street and the West Side Highway, and resulted in a ten-block traffic jam that was ultimately shut down by the New York Police Department. As part of the event, Defendants gave away over eight thousand gallons of gasoline to New York consumers, including consumers in this judicial District, all in an attempt to gain attention for their casino services, websites, and affiliate programs.

40. Upon information and belief, Defendants' computer program continues to interact with pre-registered customers in the United States, including customers in New York and this judicial District. For example, as indicated in the above image of Defendants' software (and as highlighted below), Defendants' websites and their promotional material continue to make reference to recent winnings paid in U.S. dollars to U.S. players:



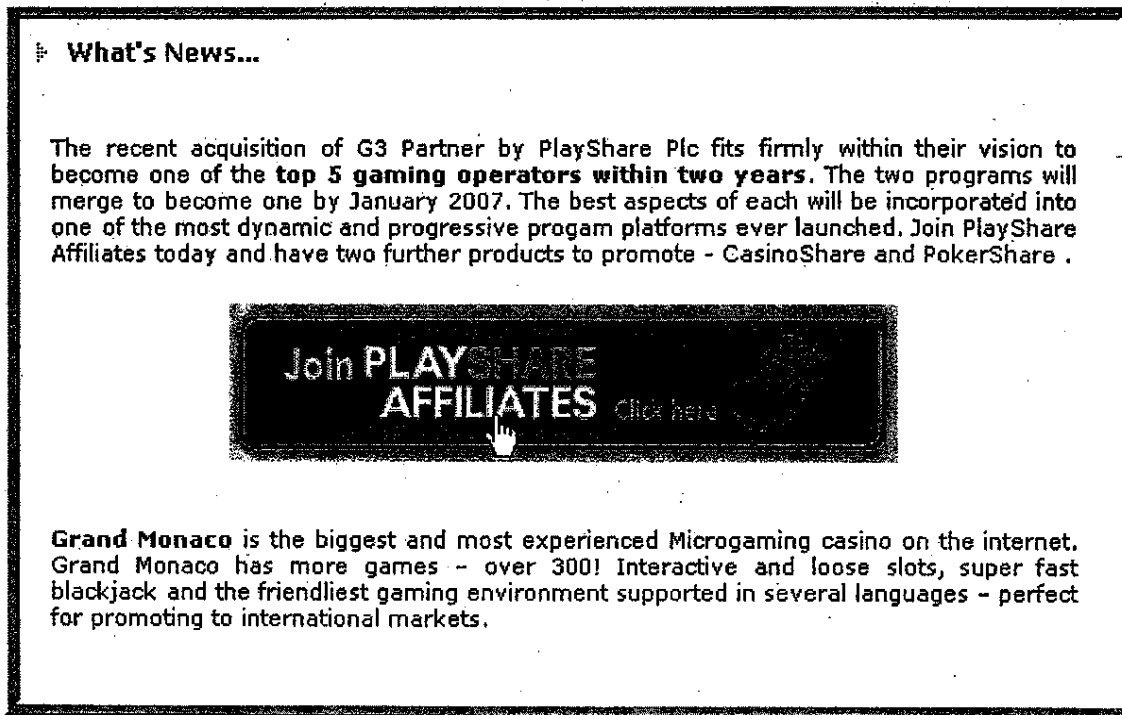
41. As a result of Defendants' use of the terms "Monaco" and "Casino" in connection with gambling services, consumers are likely to believe mistakenly that Defendants' websites are sponsored or authorized by or are affiliated with SBM. The fact that Defendants have incorporated the term "Grand" does little to dispel the likelihood of consumer confusion and indeed serves only to increase the likelihood that consumers will mistakenly believe that SBM and the Principauté of Monaco is associated with the Grand Monaco Casino. At best, Defendants' use of the term "Grand" does nothing to distinguish between the GRAND

MONACO CASINO and GRAND MONACO designations and the CASINO DE MONACO mark. Defendants' use of a royal "crest" design in connection with the GRAND MONACO designations compounds the confusion.

42. Defendants are no doubt cognizant of the similarities between their domain names and designations and the CASINO DE MONACO mark, and it is by virtue of those similarities that Defendants' enterprise has earned substantial revenues. No doubt trying to have their cake and eat it too, Defendants include a statement situated at the very bottom of their websites' home pages that, in small font, reads: "Grand Monaco is in NO way associated with the Principality of Monaco, nor ANY of the land-based casino operations located in that jurisdiction. Grand Monaco is an independent operation." The statement, which neither as a matter of law nor of fact excuses Defendants' infringing activities, demonstrates Defendants' own recognition that consumers are likely to believe mistakenly that Defendants' websites were in some way sponsored or endorsed by, or affiliated with SBM.

43. Defendants actively and aggressively advertise, promote, and market the gambling services offered in connection with the Grand Monaco Casino websites. One means through which Defendants promote their websites is "affiliate programs." Affiliates promote Defendants' services for a commission of revenues earned by Defendants for each individual gambling on Defendants' websites as a result of the affiliate's efforts. Upon information and belief, Defendants currently employ approximately 463 affiliates to promote their services and websites and derive approximately 95% of their business from affiliate advertisements featuring the GRAND MONACO CASINO and GRAND MONACO designations. Affiliates provide links to Defendants' websites in their advertisements, allowing consumers to reach Defendants' Grand Monaco Casino websites with the click of a button.

44. Defendants' affiliates promote not only the Grand Monaco Casino, but other PlayShare gaming websites offering casino services, including PokerShare.com and CasinoShare.com. For example, on its website home page, G3 advertises its association with Grand Monaco in close proximity to a discussion of its connection to and relationship with the CasinoShare and PokerShare sites, and offers hyperlinks to those websites, as seen below:



By coupling the advertising and promotion of Defendants' other gambling websites with the Grand Monaco Casino, Defendants leverage the popularity of such sites to the Grand Monaco Casino.

45. Upon information and belief, Defendant PlayShare is a public company. Notwithstanding the same, PlayShare has not publicly filed any financial statements. However, Wright has allegedly confirmed that the amount of business generated by the Grand Monaco Casino is "very substantial" and sales were at least \$120,000,000 per annum based on 2006 rates.

Based upon this assertion of Wright, it is apparent that Defendants enjoy substantial revenues from the operation of the Grand Monaco Casino.

46. Wright has stated that, in using the Monaco Domain Names and GRAND MONACO CASINO and GRAND MONACO designations, Defendants were “seeking to get some of the lustre of Monaco by incorporating the word in our name.”

47. On March 21, 2007, SBM initiated a proceeding before WIPO pursuant to the Uniform Domain Name Dispute Resolution Policy to obtain transfers of the Monaco Domain Names from Toh and Wright. A true and correct copy of the Complaint in that proceeding is attached hereto as Exhibit D. To date, no decision has been issued in that proceeding.

48. Defendants have engaged in the above-referenced activities without permission or authority from SBM. Upon information and belief, such actions were taken in bad faith with full knowledge of Plaintiff’s ownership of, and Plaintiff’s exclusive rights to use the CASINO DE MONACO mark, with the intent to deceive and mislead the public into believing that Defendants’ websites, casino software, gaming pages, and affiliate programs are sponsored, licensed, or authorized by or affiliated, connected, or otherwise associated with SBM.

49. Defendants’ use of the Grand Monaco Casino websites and Monaco Domain Names is likely to cause consumer confusion or mistake or deceive consumers into thinking that Defendants’ websites, casino software, gaming pages, and affiliate programs are authorized by, or affiliated, connected, or otherwise associated with SBM. Defendants intentionally, willfully, and in bad faith created this misimpression.

50. Defendants’ activities are likely to diminish and blur and/or tarnish the meaning of Plaintiff’s famous CASINO DE MONACO mark, thereby diluting the distinctive quality of the mark.

51. Defendants' activities have caused and will continue to cause Plaintiff great and irreparable harm and damage. Unless permanently restrained and enjoined by this Court, Defendants will persist in its unlawful activities, thereby causing further damage and irreparable harm to Plaintiff and to the public interest.

52. Plaintiff has no adequate remedy at law.

COUNT I — FEDERAL UNFAIR COMPETITION

53. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 52 of this Complaint.

54. The aforesaid acts of Defendants constitute use in commerce of words, terms, names, symbols, and devices, and combinations thereof; false designations of origin; false and misleading descriptions of fact; and false and misleading representations of fact that is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of Defendants with Plaintiff, or as to the origin, sponsorship, or approval of Defendants' services, goods, or other commercial activities by Plaintiff.

55. The aforesaid acts of Defendants constitute use in commerce of words, terms, names, symbols, and devices, and combinations thereof; false designations of origin; false and misleading descriptions of fact; and false and misleading representations of fact in commercial advertising, or promotion that misrepresents the nature, characteristics, or qualities of Defendants' services, goods, or other commercial activities.

56. The aforesaid acts of Defendants constitute false designation of origin and false and misleading descriptions and representations in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

57. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff, and unless permanently restrained by this Court, said irreparable injury will continue.

COUNT II — FEDERAL TRADEMARK INFRINGEMENT

58. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 57 of this Complaint.

59. Defendants, without the consent of Plaintiff, have used and will continue to use in commerce marks confusingly similar to SBM's registered CASINO DE MONACO trademark in connection with the sale, offering for sale, distribution and advertising of goods and/or services with which such intended use is likely to cause confusion, or to cause mistake, or to deceive.

60. The aforesaid acts of Defendants constitute trademark infringement in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

61. The aforesaid acts of Defendants have been intentional, willful, and in bad faith.

62. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff and, unless permanently restrained by this Court, said irreparable injury will continue.

COUNT III — FEDERAL CYBERSQUATTING

63. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 62 of this Complaint.

64. The aforesaid acts of Defendants constitute the registration, maintenance and use of numerous domain names (the Monaco Domain Names) that are virtually identical to, confusingly similar to, and dilutive of SBM's famous CASINO DE MONACO mark, knowingly and with a bad-faith intent to profit therefrom.

65. The aforesaid acts of Defendants constitute unlawful cybersquatting in violation of the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

66. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff, and unless permanently restrained by this Court, said irreparable injury will continue.

**COUNT IV — DECEPTIVE ACTS AND
PRACTICES UNDER NEW YORK LAW**

67. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 66 of this Complaint.

68. The aforesaid acts of Defendants constitute deceptive acts or practices in the conduct of business, trade, or commerce, or in the furnishing of any service in New York State in violation of Section 349(h) of the New York General Business Law.

69. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff, and unless permanently restrained by this Court, said irreparable injury will continue.

COUNT V — FALSE ADVERTISING UNDER NEW YORK LAW

70. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 69 of this Complaint.

71. Defendants misleadingly advertised services, in that Defendants made statements, used words, designs, devices, sounds, or combinations thereof that failed to reveal facts material in the light of such representations with respect to the subject service, or under such conditions as are customary or usual.

72. The aforesaid acts of Defendants constitute false advertising in the conduct of business, trade, or commerce, or in the furnishing of any service in New York State in violation

of Section 350-e(3) of the New York General Business Law.

73. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff, and unless permanently restrained by this Court, said irreparable injury will continue.

**COUNT VI — INJURY TO BUSINESS
REPUTATION AND DILUTION UNDER NEW YORK LAW**

74. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 73 of this Complaint.

75. The aforesaid acts of Defendants constitute intended use beginning after the CASINO DE MONACO mark had become famous and will dilute the distinctive quality of the CASINO DE MONACO mark.

76. The aforesaid acts of Defendants are likely to injure the business reputation of Plaintiff and to dilute the distinctive quality of Plaintiff's trademarks in violation of 360-1 of the New York General Business Law.

77. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff, and unless permanently restrained by this Court, said irreparable injury will continue.

COUNT VII — COMMON LAW TRADEMARK INFRINGEMENT

78. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 77 of this Complaint.

79. The aforesaid acts of Defendants constitute use that is likely to cause confusion as to the source of Defendants' goods and/or services.

80. The aforesaid acts of Defendants constitute trademark infringement in violation of common law.

81. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff, and unless permanently restrained by this Court, said irreparable injury will continue.

COUNT VIII — COMMON LAW UNFAIR COMPETITION

82. Plaintiff hereby realleges and incorporates by reference the allegations of paragraphs 1 through 81 of this Complaint.

83. The aforesaid acts of Defendants constitute use that is likely to cause confusion as to the source of Defendants' goods and/or services.

84. The aforesaid acts of Defendants constitute unfair competition in violation of common law.

85. The aforesaid acts of Defendants have caused, and are causing, great and irreparable harm to Plaintiff, and unless permanently restrained by this Court, said irreparable injury will continue.

RELIEF REQUESTED

WHEREFORE, Plaintiff prays for a judgment in its favor and against Defendants ordering:

a. That Defendants, and each of its officers, directors, agents, servants, employees and representatives, and those persons in active concert or participation with them or any of them, be permanently enjoined and restrained from:

(1) Using on or in connection with the promotion, advertisement, marketing, offering, operation or in any manner using gaming or gambling services, online or on land, including as a domain name or a component thereof, the Monaco Domain Names or any colorable imitations thereof or anything confusingly similar thereto; or the CASINO DE MONACO mark, or any colorable imitations thereof or anything confusingly similar

thereto;

(2) Representing by any means whatsoever, directly or indirectly, or doing any other acts or things calculated or likely to cause confusion, mistake, or to deceive consumers into believing that Defendants' goods and/or services are the services or products of Plaintiff, or that there is any affiliation or connection between Plaintiff or its services and goods and Defendants or their services and products and from otherwise unfairly competing with Plaintiff;

(3) Registering, using or transferring the Monaco Domain Names and from registering, using, copying, reproducing or imitating the CASINO DE MONACO mark, or any colorable imitations thereof or anything confusingly similar thereto;

(4) Using any mark in a manner so as to cause the dilution of the distinctive quality of the famous CASINO DE MONACO mark;

(5) Using any designation incorporating the designation MONACO or MONTE CARLO for casino-related products or services.

b. That Defendants be directed to file with this Court and to serve upon Plaintiff within thirty (30) days after service upon Defendants of this Court's injunction issued in this action, a written report by Defendants under oath setting forth in detail the manner in which Defendants has complied with this injunction.

c. That Plaintiff recover its damages sustained as a result of Defendants' federal trademark infringement, unfair competition, and cyber squatting, together with an accounting of Defendants' profits arising from such activities, and that the Court exercise its discretion and enter a judgment for such additional sums as the Court shall find to be just, according to the egregious nature of the acts of Defendant.

d. That Plaintiff have and recover treble damages under 15 U.S.C. § 1117 by reason of the willful and deliberate acts of federal trademark infringement by Defendant.

e. That Plaintiff have and recover treble damages under New York General Business Law §§ 349(h) and 350-d by reason of Defendants' acts of deceptive trade practices.

f. That Plaintiff have and recover its reasonable attorneys' fees pursuant to 15 U.S.C. § 1117 and New York General Business Law §§ 349(h) and 350-d.

g. That Plaintiff have and recover Defendants' profits and/or damages by reason of Defendants' acts of trademark infringement and unfair competition under common law.

h. That Defendants be required to recall from any and all channels of trade any and all advertising or promotional materials or other infringing matter, and to take affirmative steps to dispel any false suggestion of a connection to Plaintiff by virtue of its infringing activities, including, but not limited to, all necessary and appropriate corrective advertising measures.

i. That Plaintiff have and recover its taxable costs and disbursements herein.

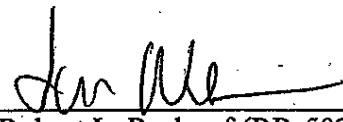
j. That Plaintiff have such other and further relief as the Court may deem just and proper.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demands a jury trial on all issues triable to a jury.

DATED: New York, New York
June 7, 2007

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

By: 
Robert L. Raskopf (RR-5022)
Alan Blum (AB-6937)
Lori E. Weiss (LW-7866)

51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel: (212) 849-7000
Fax: (212) 849-7100

ATTORNEYS FOR SOCIETE DES BAINS
DE MER ET DU CERCLE DES
ETRANGERS A MONACO

Of Counsel:

QUINN EMANUEL URQUHART OLIVER
& HEDGES, LLP
George R. Hedges
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

EXHIBIT A

Cahier des Charges.

relatif à l'exploitation du privilège

Concédé par Décret du 2 avril 1863.

Article 1^{er}

La Société s'engage à entretenir dans la Principauté, au lieu dit : Les Espérouques, qui à l'avenir portera le nom de Monte Carlo, l'établissement y existant sous le nom de Cercle des Étrangers.

Article 2.

La Société devra maintenir sur le territoire de Monaco l'établissement de Bains de Mer y existant, sans néanmoins qu'elle puisse mettre obstacle aux bains de toute nature, ceux de mer exceptés, qui pourraient être établis tant à l'intérieur qu'à l'extérieur de la ville.

Article 3.

La Société devra entretenir l'usine à Gaz établie sur le terrain qui lui a été gratuitement concédé par le gouvernement à Son Altesse Sérénissime au lieu dit la fontaine d'Antoine.

James Thompson

12 May 1964, L. A. S.

Spencer & Co. Ltd.

Attest: *James H. Lane*

100-443881-100

denonce au droit de l'Etat.

Handwritten text: *Handwritten text, possibly a signature or name.*

David [illegible]

Am. Red. L. K.

100

2. Chronic

Article 4.

À l'expiration du Privilège de concession
Son Altesse Sérénissime le Prince de Monaco
se réserve la propriété des Etablissements ci-dessus
dénommés en vertu des articles 1. 2 & 3 ci-dessus, ainsi que de tout
le matériel et mobilier appartenant auxdits Etablissements
et dont l'inscristion sera renouvelée le 1^{er} Janvier
de chaque année.

L. H. Albion.

Article 5.

La Société devra établir dans la Ville de Monan
avant le 1^{er} Septembre 1868, une fontaine d'eau
jaillissante qui alimentera 3. autres fontaines
d'une manière suffisante aux besoins de la popu-
lation.

Cette fontaine, ainsi que les autres fontaines
ont le plan et l'emplacement devant être approuvé
par l'autorité, et immédiatement transmis
à l'Etat, avec tous ses réservoirs, bœufs et autres
accessoires. La société pourra également exécuter
les travaux nécessaires pour fournir, moyennant
rétribution, de l'eau aux particuliers.

Article 6

La Société devra allouer à ses frais les deux sa-
gax posés dans le Palais et la ville de Monaco,
ainsi que les autres deux places dans la ville.

La Société pourra fournir du gaz aux particuliers
aux conditions du cahier des charges annexé au

Arrêté Municipal n° 2003-26 du 19 mars 2003 prononçant l'admission à la retraite anticipée d'un fonctionnaire (p. 668).

AVIS ET COMMUNIQUÉS

MINISTÈRE D'ÉTAT

Secrétariat Général.

Modification de l'heure légale - Année 2003 (p. 668).

Direction de la Fonction Publique et des Ressources Humaines.

Avis de recrutement n° 2003-32 d'une Gouvernante chargée de la Résidence Archépiscopale (p. 668).

Avis de recrutement n° 2003-37 d'un Cuisinier au Mess de la Force Publique (p. 669).

Avis de recrutement n° 2003-38 d'un Ouvrier électromécanicien au Service de l'Aménagement Urbain (p. 669).

Avis de recrutement n° 2003-39 d'un Jardinier aide-ouvrier professionnel au Service de l'Aménagement Urbain (p. 669).

Avis de recrutement n° 2003-40 d'un Conseiller Technique au Service d'Information et de Contrôle sur les Circuits Financiers (p. 669).

DÉPARTEMENT DES FINANCES ET DE L'ÉCONOMIE

Office des Emissions de Timbres-Poste.

Mises en vente de timbres commémoratifs (p. 670).

MAIRIE

Convocation du Conseil Communal - Session extraordinaire - Séance publique du mardi 1^{er} avril 2003 (p. 670).

Avis de vacance n° 2003-034 d'un poste de Chef de service au Service de Gestion des Personnels (p. 670).

Avis de vacance n° 2003-038 de trois postes de Surveillants de Jardins saisonniers à la Police Municipale (p. 671).

Avis de vacance n° 2003-039 de trois postes de Surveillants de Jardins saisonniers à la Police Municipale (p. 671).

Avis de vacance n° 2003-040 d'un poste de Surveillant de Jardins saisonnier à la Police Municipale (p. 671).

INFORMATIONS (p. 671).

INSERTIONS LÉGALES ET ANNONCES (p. 672 à p. 686).

DECISION SOUVERAINE

Erratum à la Décision Souveraine du 27 mai 2002 publiée au "Journal de Monaco" du 14 juin 2002 relative à la nomination des membres de la Commission Consultative de la Collection Philatélique de S.A.S. le Prince Souverain.

Lire page 971 :

Le second paragraphe est modifié comme suit :

Sont nommés Membres de ladite Commission les personnes suivantes :

Le reste sans changement.

ORDONNANCES SOUVERAINES

Ordonnance Souveraine n° 15.732 du 13 mars 2003 renouvelant le privilège des jeux concédé à la Société des Bains de Mer et du Cercle des Etrangers à Monaco et approuvant le cahier des charges et les conventions annexes afférents.

RAINIER III
PAR LA GRACE DE DIEU
PRINCE SOUVERAIN DE MONACO

Vu la délibération du Conseil de Gouvernement en date du 21 novembre 2002 qui Nous a été communiquée par Notre Ministre d'Etat ;

Avons Ordonné et Ordonnons :

ARTICLE PREMIER.

Le privilège des jeux, octroyé à la Société des Bains de Mer et du Cercle des Etrangers pour la première fois le 2 avril 1863, est renouvelé pour vingt années, à compter du 1^{er} avril 2007.

ART. 2.

Sont approuvés le cahier des charges et les conventions annexes intervenus le 21 mars 2003 entre Notre Administration des Domaines, M. Jean-Luc BIAMONTI, Président de la Société des Bains de Mer et du Cercle des Etrangers, et M. Bernard LAMBERT,

Vendredi 28 mars 2003

JOURNAL DE MONACO

663

Directeur Général de la Société des Bains de Mer et du Cercle des Etrangers.

ART. 3.

Notre Secrétaire d'Etat, Notre Directeur des Services Judiciaires et Notre Ministre d'Etat sont chargés, chacun en ce qui le concerne, de l'exécution de la présente ordonnance.

Donné en Notre Palais à Monaco, le treize mars deux mille trois.

RAINIER.

Par le Prince,
Le Secrétaire d'Etat :
R. NOVELLA.

Ordonnance Souveraine n° 15.737 du 18 mars 2003 portant naturalisation monégasque.

RAINIER III
PAR LA GRACE DE DIEU
PRINCE SOUVERAIN DE MONACO

Vu la requête qui Nous a été présentée par le Sieur Alain, Louis, Germain BAUBRIT, tendant à son admission parmi Nos sujets ;

Vu la Constitution ;

Vu la loi n° 1.155 du 18 décembre 1992, modifiée par la loi n° 1.199 du 26 décembre 1997, et notamment les articles 5 et 13 ;

Vu l'article 25 § 2 de l'ordonnance organique du 9 mars 1918 ;

Vu Notre ordonnance n° 403 du 15 mai 1951, modifiée ;

Sur le rapport de Notre Directeur des Services Judiciaires ;

Notre Conseil de la Couronne entendu lors de sa séance du 11 juin 2002 ;

Avons Ordonné et Ordonnons :

Le Sieur Alain, Louis, Germain BAUBRIT, né le 31 octobre 1955 à Nantes (Loire-Atlantique), est naturalisé monégasque.

Il sera tenu et réputé comme tel et jouira de tous les droits et prérogatives attachés à cette qualité, dans les conditions prévues par l'article 13 de la loi n° 1.155 du 18 décembre 1992, modifiée.

Notre Secrétaire d'Etat, Notre Directeur des Services Judiciaires et Notre Ministre d'Etat sont chargés, chacun en ce qui le concerne, de l'exécution de la présente ordonnance.

Donné en Notre Palais à Monaco, le dix-huit mars deux mille trois.

RAINIER.

Par le Prince,
Le Secrétaire d'Etat :
R. NOVELLA.

Ordonnance Souveraine n° 15.738 du 18 mars 2003 portant naturalisations monégasques.

RAINIER III
PAR LA GRACE DE DIEU
PRINCE SOUVERAIN DE MONACO

Vu les requêtes qui Nous ont été présentées par le Sieur Guy, Pierre, François BOSCAGLI et la Dame Lucile, Angèle, Joséphine GRAC, son épouse, tendant à leur admission parmi Nos sujets ;

Vu la Constitution ;

Vu la loi n° 1.155 du 18 décembre 1992, modifiée par la loi n° 1.199 du 26 décembre 1997, et notamment les articles 5, 6 et 13 ;

Vu l'article 25 § 2 de l'ordonnance organique du 9 mars 1918 ;

Vu Notre ordonnance n° 403 du 15 mai 1951, modifiée ;

Sur le rapport de Notre Directeur des Services Judiciaires ;

Notre Conseil de la Couronne entendu lors de sa séance du 16 avril 2002 ;

Avons Ordonné et Ordonnons :

Le Sieur Guy, Pierre, François BOSCAGLI, né le 24 octobre 1955 à Monaco et la Dame Lucile, Angèle,

Schedule C

SOVEREIGN ORDER

Sovereign Order no. 15.732 of March 13, 2003, renewing the gaming monopoly granted to the Société des Bains de Mer et du Cercle des Etrangers à Monaco and approving the terms and conditions and related agreements appended thereto.

RAINIER III
By the Grace of God
Sovereign Prince of Monaco

In view of the deliberation of the Government Council of November 21, 2002 which was communicated to us by Our Minister of State;

Have Ordered and Order:

ARTICLE 1

The gaming monopoly, granted to the Société des Bains de Mer et du Cercle des Etrangers for the first time on April 2, 1863, is hereby renewed for twenty years, as of April 1, 2007.

ART. 2

Are hereby approved the terms and conditions and the related agreements concluded on March 21, 2003 between Our Public Lands Administration, Mr. Jean-Luc BIAMONTI, President of the Société des Bains de Mer et du Cercle des Etrangers, and Mr. Bernard LAMBERT, CEO of the Société des Bains de Mer et du Cercle des Etrangers.

ART. 3

Our Secretary of State, Our Director of Legal Services and Our Minister of State are, each of them insofar as he is concerned, in charge of the enforcement of the present order.

Given in Our Palace in Monaco, on March 13, 2003.

RAINIER.

By the Prince,
The Secretary of State:
R. NOVELLA

DE GAULLE FLEURANCE & ASSOCIES
SOCIETE D'AVOCATS
11, RUE MORTALIS
75008 PARIS
TEL : 01 56 64 00 00
FAX : 01 56 64 00 01

EXHIBIT B

Int. Cls.: 9, 16, 28 and 41

Prior U.S. Cls.: 2, 5, 21, 22, 23, 26, 29, 36, 37, 38, 50,
100, 101 and 107

United States Patent and Trademark Office

Reg. No. 3,031,006

Registered Dec. 20, 2005

**TRADEMARK
SERVICE MARK
PRINCIPAL REGISTER**

CASINO DE MONACO

SOCIETE ANONYME DES BAINS DE MER ET
DU CERCLE DES ETRANGERS A MONACO
(MONACO COMPANY)
PLACE DU CASINO
MC 9800 MONTE CARLO, MONACO

FOR: ELECTRIC APPARATUS AND INSTRUMENTS, NAMELY COMPUTERIZED VIDEO GAMES FOR GAMING PURPOSES, INTERACTIVE VIDEO GAMES OF VIRTUAL REALITY COMPRISED OF COMPUTER HARDWARE AND SOFTWARE, MACHINES FOR PLAYING GAMES OF CHANCE, COMPUTER SOFTWARE GAMES, SOFTWARE FOR USE IN GAMING MACHINES AND GAMING EQUIPMENT, GAMING EQUIPMENT NAMELY GAMING MACHINES, SLOT MACHINES, KENO AND POKER MACHINES, COIN CHANGERS, COIN ACCEPTERS FOR SEPARATING GOOD COINS FROM COUNTERFEITS; PHOTOGRAPHIC APPARATUS; CONTROLLING AND SIGNALING APPARATUS USED IN CASINOS; APPARATUS FOR RECORDING, TRANSMISSION, REPRODUCTION OF SOUND OR IMAGES, NAMELY RADIO APPARATUS, VIDEO SCREEN, VIDEO CAMERAS; CALCULATORS, DATA PROCESSING EQUIPMENT, NAMELY COMMUNICATION SERVERS, COMMUNICATION SOFTWARE FOR CONNECTING GLOBAL COMPUTER NETWORKS, COMPUTER CAMERAS, COMPUTER GAME SOFTWARE; COMPUTER ECOMMERCE SOFTWARE TO ALLOW USERS TO PERFORM ELECTRONIC BUSINESS TRANSACTIONS VIA A GLOBAL COMPUTER NETWORK AND COMPUTERS; FIRE EXTINGUISHERS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FOR: PRINTED MATTER, NAMELY BLANK OR PARTIALLY PRINTED POSTCARDS, PRINTED INVITATIONS, PRINTED MENUS, PRINTED PAPER SIGNS, MENU BOARDS, PRINTED TIMETABLES, BOOKS, MAGAZINES, CATALOGUES FEATURING CASINO, HOTEL AND INTERNATIONAL NEWS, TOURISM; BOOKBINDINGS; PHOTOGRAPHS,

STATIONERY; ADHESIVES TAPES FOR STATIONERY OR HOUSEHOLD PURPOSES; ARTISTS' MATERIALS, NAMELY PENCILS, PENS, BRUSHES, PAINT BRUSHES; TYPEWRITERS AND OFFICE REQUISITES, NAMELY TYPEWRITER TYPING ELEMENTS, RUBBER BANDS, STAPLERS; PRINTED INSTRUCTIONAL, EDUCATIONAL, AND TEACHING MATERIALS USED IN HOTELS AND CASINOS FOR TEACHING DIFFERENT GAMES; PLASTIC MATERIALS FOR PACKAGING, NAMELY BAGS FOR PACKAGING, TUBS FOR CONSUMER PRODUCTS, PLASTIC FILMS USED AS PACKAGING FOR FOOD, ENVELOPES, POUCHES FOR MERCHANDISE PACKAGING; PRINTERS' TYPE; PRINTING BLOCKS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FOR: GAMES AND PLAYTHINGS, NAMELY PLAYING CARDS, BOARD GAMES, CARD GAMES, COIN-OPERATED VIDEO GAMES, DISPOSABLE TICKET SETS FOR PLAYING GAMES OF CHANCE, HAND HELD UNITS FOR PLAYING ELECTRONIC AND VIDEO GAMES, LOTTERY GAMES, DOMINOS, PARLOR GAMES, EUROPEAN ROULETTE, AMERICAN ROULETTE, VIDEO POKER, POKER GAME AND BOULE GAME; GYMNASRIC AND SPORTING ARTICLES, NAMELY GOLF BAGS AND BALLS, SPORT BALLS, PLAY SWIMMING POOLS, SWIMMING EQUIPMENT, GYMNASRIC APPARATUS, GYMNASRIC TRAINING STOOLS, PORTABLE SUPPORT STRETCHING FOR DANCE AND OTHER EXERCISES AND TENNIS EQUIPMENT; DECORATION FOR CHRISTMAS TREES, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FOR: ORGANIZING COMMUNITY SPORTING AND CULTURAL ACTIVITIES; PROVIDING CASINO SERVICES WITHIN A HOTEL RESORT ENVIRONMENT; TRAINING FOR THE PERSONNEL EMPLOYED IN CASINOS IN THE USE AND OPERATION OF SLOT MACHINES AND CINEMA EQUIPMENT; CONDUCTING EDUCATIONAL EN-

ENTERTAINMENT EXHIBITS IN THE NATURE OF COOKING DEMONSTRATIONS; ENTERTAINMENT SERVICES IN THE NATURE OF OPERA, NAMELY, ORGANIZING, PRODUCING AND PRESENTING LIVE MUSICAL, ORCHESTRAL AND OPERATIVE SHOWS; ORGANIZING SPORTING EVENTS IN THE NATURE OF CAR RACING, TENNIS TOURNAMENTS, GOLF TOURNAMENTS, AND SWIMMING COMPETITIONS, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

PRIORITY CLAIMED UNDER SEC. 44(D) ON MONACO APPLICATION NO. 23610, FILED 7-1-2002, REG. NO. 02.23234, DATED 9-30-2002, EXPIRES 7-1-2012.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE CASINO, APART FROM THE MARK AS SHOWN.

THE ENGLISH TRANSLATION OF CASINO DE MONACO IS CASINO OF MONACO.

SEC. 2(F).

SER. NO. 76-478,796, FILED 12-24-2002.

ALICE BENMAMAN, EXAMINING ATTORNEY

EXHIBIT C

PRINCIPALTE DE MONACO

MINISTERE D'ETAT

DIRECTION DE L'EXPANSION ECONOMIQUE

MARQUES

DE FABRIQUE, DE COMMERCE OU DE SERVICE

CERTIFICAT D'IDENTITE DE MARQUE

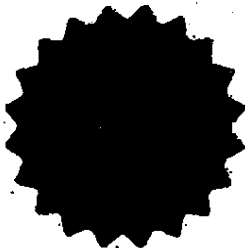
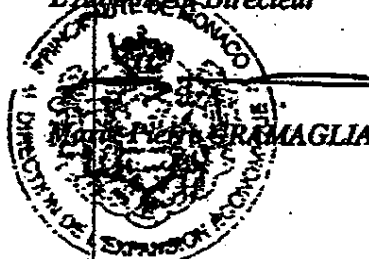
*Le soussigné certifie que la marque ci-annexée a été déposée le 01/07/2002 suivant
procès-verbal de dépôt n° 23610 par la société anonyme monégasque :*

**SOCIETE DES BAINS DE MER ET DU CERCLE
DES ETRANGERS A MONACO
Enseigne "SBM", Place du Casino
98000 MONACO
Principauté de Monaco**

qu'elle a été enregistrée le 30/09/2002 sous le numéro 02.23234

Fait à Monaco, le 14 avril 2003

**P/Le Directeur
L'Administrateur Directeur**



Translated from the French

PRINCIPALITY OF MONACO
MINISTRY OF STATE
DEPARTMENT OF ECONOMIC EXPANSION
TRADEMARKS
OF BRAND, TRADE OR SERVICE
CERTIFICATE OF TRADEMARK IDENTITY

The undersigned certifies that the appended trademark was filed on July 1, 2002 pursuant to record of filing N° 23610 by:

*Joint-stock company ["Société Anonyme"] DES BAINS DE MER ET DU CERCLE DES ETRANGERS
A MONACO
Place du Casino
98000 Monaco*

Principality of Monaco

And that the trademark was registered on September 30, 2002, with number 02.23234

Signed in Monaco, on January 13, 2003

[Seal]

*[Seal] Principality of Monaco, Department of
Economic Expansion*

*pp. The Director
Assistant to the Director
[a signature]
Marie Pierre GRAMAGLIA*

EXHIBIT D

COMPLAINT TRANSMITTAL COVERSHEET

Attached is a Complaint that has been filed against you with the World Intellectual Property Organization (WIPO) Arbitration and Mediation Center (the Center) pursuant to the Uniform Domain Name Dispute Resolution Policy (the Policy) approved by the Internet Corporation for Assigned Names and Numbers (ICANN) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the Rules), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the Supplemental Rules).

The Policy is incorporated by reference into your Registration Agreement with the Registrar(s) of your domain name(s), in accordance with which you are required to submit to a mandatory administrative proceeding in the event that a third party (a Complainant) submits a complaint to a dispute resolution service provider, such as the Center, concerning a domain name that you have registered. You will find the name and contact details of the Complainant, as well as the domain name(s) that is/are the subject of the Complaint in the document that accompanies this Coversheet.

You have no duty to act at this time. Once the Center has checked the Complaint to determine that it satisfies the formal requirements of the Policy, the Rules and the Supplemental Rules, it will forward an official copy of the Complaint to you. You will then have 20-calendar days within which to submit a Response to the Complaint in accordance with the Rules and Supplemental Rules to the Center and the Complainant. You may represent yourself or seek the assistance of legal counsel to represent you in the administrative proceeding.

- The Policy can be found at <http://arbiter.wipo.int/domains/rules/>
- The Rules can be found at <http://arbiter.wipo.int/domains/rules/>
- The Supplemental Rules, as well as other information concerning the resolution of domain name disputes can be found at <http://arbiter.wipo.int/domains/rules/>
- A model Response can be found at <http://arbiter.wipo.int/domains/respondent/index.html>

Alternatively, you may contact the Center to obtain any of the above documents. The Center can be contacted in Geneva, Switzerland by telephone at +41 22 338 8247, by fax at +41 22 740 3700 or by e-mail at domain.disputes@wipo.int.

You are kindly requested to contact the Center to provide the contact details to which you would like (a) the official version of the Complaint and (b) other communications in the administrative proceeding to be sent.

A copy of this Complaint has also been sent to the Registrar(s) with which the domain name(s) that is/are the subject of the Complaint is/are registered.

By submitting this Complaint to the Center the Complainant hereby agrees to abide and be bound by the provisions of the Policy, Rules and Supplemental Rules.

Before the:

**WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER**

**La Société des Bains de Mer et du
cercle des étrangers à Monaco,
Place du Casino, Monte Carlo, MC
98000 Monaco, Principauté de Monaco**

(Complainant)

-v-

**Lucan Toh and Max Wright
46 Berkeley Square
London, London W1J 5AT
United Kingdom**

(Respondents)

Disputed Domain Names:

**grandmonaco.com
casinograndmonaco.com
grandmonacocasino.com
deutschesgrandmonaco.com
grandmonacoayda.com
grandmonacoayuda.com
grandmonacobingo.com
grand-monaco.com
grand-monaco-casino.com
grand-monaco-poker.com
grandmonacocasinoclub.com
grandmonacoclub.com
grandmonacocraps.com
grandmonacogames.com
grandmonacogaming.com
grandmonacohost.com
grandmonacohosts.com
grandmonacolottery.com
grandmonacolotto.com
grandmonacolounge.com
grandmonacomahjong.com
grandmonacomillions.com
grandmonaconews.com
grandmonacoonlinecasino.com
grandmonacoonlinegaming.com
grandmonacoonlinepoker.com
grandmonacopartners.com
grandmonacoplayersclub.com
grandmonacopoker.com**

grandmonacopokerclub.com
grandmonacopromotions.com
grandmonacoracebook.com
grandmonacorewards.com
grandmonacoskillgames.com
grandmonacoslots.com
grandmonacosports.com
grandmonacosportsbook.com
grandmonacostore.com
grandmonacosupport.com
grandmonacovideopoker.com
grandmonaco.net
casinograndmonaco.net
grandmonacobingo.net
grandmonacocasino.net
grandmonacocasinoclub.net
grandmonacogames.net
grandmonacogaming.net
grandmonacolottery.net
grandmonacomillions.net
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grandmonacopoker.net
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grandmonacosports.net
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pokergrandmonaco.net
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casinograndmonaco.org
grandmonacocasino.org
grandmonacocasinoclub.org
grandmonacomillions.org
grandmonacopoker.org
grandmonacopokerclub.org
grandmonacoracebook.org
pokergrandmonaco.org

AMENDED COMPLAINT

(Rules, para. 3(b))

I. Introduction

- [1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (the Policy), approved by the Internet Corporation for Assigned Names and Numbers (ICANN) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the Rules), approved by ICANN on October 24, 1999 and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the Supplemental Rules).

II. The Parties

A. The Complainant

(Rules, para. 3(b)(ii) and (iii))

[2.] The Complainant in this administrative proceeding is:

Société des Bains de Mer et du Cercle des Etrangers à Monaco, a limited liability company enrolled with the registry of companies of Monaco under number 56 S 00523, represented by its legal representatives,

As referred hereunder as the **Société des Bains de Mer** or **SBM**.

[3.] The Complainant's contact details are:

Address: Place du Casino, Monte Carlo, MC 98000 Monaco,
Principauté de Monaco.
Telephone: +377 92 16 20 00
Fax: +377 92 16 38 93

[4.] The Complainant's authorized representative in this administrative proceeding is:

Representative: De Gaulle Fleurance & Associés
Address: 11, rue Portalis
75008 Paris
France
Telephone: +33 1 56 64 00 00
Fax: +33 1 56 64 00 01
E-mail: jhorn@dgfla.com

[5.] The Complainant's preferred method of communications directed to the Complainant in this administrative proceeding is:

Electronic-only material

Method: e-mail
Address: jhorn@dgfla.com

Contact: Maître Julien Horn

Material including hardcopy

Method: post
Address: De Gaulle Fleurance & Associés
11, rue Portalis
75008 Paris
France

Contact: Maître Julien Horn

B. The Respondent

(Rules, para. 3(b)(v))

[6.] The disputed domain names are registered to **Lucan Toh or Max Wright** as shown in the Registrar's WhoIs database as shown in the printouts provided in Annex [A].

[7.] All information known to the Complainant regarding how to contact the Respondents is as follows:

Address: **Lucan Toh and Max Wright**
46, Berkeley Square
London, London W1J 5AT
United Kingdom

Telephone: +44-20- 7598- 4064

Email: calan.horsman@playshare.com

III. The Domain Names and Registrar

(Rules, para. 3(b)(vi) and (vii))

[8.] This dispute concerns the domain names identified below:

GRANDMONACO.COM
CASINOGRANDMONACO.COM
GRANDMONACOCASINO.COM
DEUTSCHESGRANDMONACO.COM
GRANDMONACOAYDA.COM
GRANDMONACOAYUDA.COM
GRANDMONACOBINGO.COM
GRAND-MONACO.COM
GRAND-MONACO-CASINO.COM
GRAND-MONACO-POKER.COM
GRANDMONACOCASINOCLUB.COM
GRANDMONACOCLUB.COM
GRANDMONACOCRAPS.COM
GRANDMONACOGAMES.COM
GRANDMONACOGAMING.COM
GRANDMONACOHOST.COM
GRANDMONACOHOSTS.COM
GRANDMONACOLOTTERY.COM
GRANDMONACOLOTTO.COM
GRANDMONACOLOUNGE.COM
GRANDMONACOMAHJONG.COM
GRANDMONACOMILLIONS.COM
GRANDMONACONEWS.COM
GRANDMONACOONLINECASINO.COM
GRANDMONACOONLINEGAMING.COM
GRANDMONACOONLINEPOKER.COM
GRANDMONACOPARTNERS.COM
GRANDMONACOPLAYERSCLUB.COM
GRANDMONACOPOKER.COM
GRANDMONACOPOKERCLUB.COM
GRANDMONACOPROMOTIONS.COM
GRANDMONACORACEBOOK.COM
GRANDMONACOREWARDS.COM
GRANDMONACOSKILLGAMES.COM
GRANDMONACOSLOTS.COM
GRANDMONACOSPORTS.COM

GRANDMONACOSPORTSBOOK.COM
GRANDMONACOSTORE.COM
GRANDMONACOSUPPORT.COM
GRANDMONACOVIDEOPOKER.COM
GRANDMONACO.NET
CASINOGRANDMONACO.NET
GRANDMONACOBINGO.NET
GRANDMONACOCASINO.NET
GRANDMONACOCASINOCUB.NET
GRANDMONACOGAMES.NET
GRANDMONACOGAMING.NET
GRANDMONACOLOTTERY.NET
GRANDMONACOMILLIONS.NET
GRANDMONACOPLAYERSCLUB.NET
GRANDMONACOPOKER.NET
GRANDMONACOPOKERCLUB.NET
GRANDMONACORACEBOOK.NET
GRANDMONACOSKILLGAMES.NET
GRANDMONACOSPORTS.NET
GRANDMONACOSPORTSBOOK.NET
POKERGRANDMONACO.NET
GRANDMONACO.ORG
CASINOGRANDMONACO.ORG
GRANDMONACOCASINO.ORG
GRANDMONACOCASINOCUB.ORG
GRANDMONACOMILLIONS.ORG
GRANDMONACOPOKER.ORG
GRANDMONACOPOKERCLUB.ORG
GRANDMONACORACEBOOK.ORG
POKERGRANDMONACO.ORG

Copies of the printouts of the Whois searches are provided in Annex [A].

[9.] The registrar with whom all the domain names are registered is:

Name: Go Daddy Software Inc.

Address: 14455 N. Hayden Rd.
Suite 219
Scottsdale, AZ 85260
United States of America

Telephone: +1 480 505-8899

Fax: +1 480 505-8844

E-mail: abuse@godaddy.com

IV. Jurisdictional Basis for the Administrative Proceeding

(Rules, paras. 3(a), 3(b)(xv))

[10.] The dates on which the registration agreements of the disputed domain names were entered are detailed in the following table:

DOMAIN NAME	REGISTRATION AGREEMENT DATE
grandmonaco.com	October 23, 2004
casinograndmonaco.com	December 19, 2005
grandmonacocasino.com	June 23, 2005
deutschesgrandmonaco.com	August 3, 2006
grandmonacoayda.com	July 27, 2006
grandmonacoayuda.com	July 27, 2006
grandmonacobingo.com	January 3, 2006
grand-monaco.com	December 21, 2005
grand-monaco-casino.com	December 21, 2005
grand-monaco-poker.com	December 21, 2005
grandmonacocasinoclub.com	December 21, 2005
grandmonacoclub.com	January 3, 2006
grandmonacocraps.com	February 20, 2006
grandmonacogames.com	January 3, 2006
grandmonacogaming.com	February 20, 2006
grandmonacohost.com	April 13, 2006
grandmonacohosts.com	April 13, 2006
grandmonacolottery.com	January 3, 2006
grandmonacolotto.com	January 3, 2006

grandmonacolounge.com	April 7, 2006
grandmonacomahjong.com	August 23, 2006
grandmonacomillions.com	December 21, 2005
grandmonaconews.com	April 18, 2006
grandmonacoonlinecasino.com	March 15, 2006
grandmonacoonlinegaming.com	March 15, 2006
grandmonacoonlinepoker.com	March 15, 2006
grandmonacopartners.com	August 23, 2006
grandmonacoplayersclub.com	April 7, 2006
grandmonacopoker.com	December 19, 2005
grandmonacopokerclub.com	December 21, 2005
grandmonacopromotions.com	February 20, 2006
grandmonacoracebook.com	February 3, 2006
grandmonacorewards.com	May 31, 2006
grandmonacoskillgames.com	January 3, 2006
grandmonacoslots.com	January 3, 2006
grandmonacosports.com	January 3, 2006
grandmonacosportsbook.com	January 3, 2006
grandmonacostore.com	January 3, 2006
grandmonacosupport.com	May 31, 2006
grandmonacovideopoker.com	February 20, 2006
grandmonaco.net	December 19, 2005
casinograndmonaco.net	December 19, 2005
grandmonacobingo.net	January 3, 2006
grandmonacocasino.net	December 19, 2005
grandmonacocasineclub.net	December 21, 2005
grandmonacogames.net	February 20, 2006
grandmonacogaming.net	February 20, 2006
grandmonacolottery.net	January 3, 2006
grandmonacomillions.net	December 21, 2005
grandmonacoplayersclub.net	April 7, 2006
grandmonacopoker.net	December 19, 2005
grandmonacopokerclub.net	December 21, 2005
grandmonacoracebook.net	February 3, 2006
grandmonacoskillgames.net	January 3, 2006

grandmonacosports.net	January 3, 2006
grandmonacosportsbook.net	January 3, 2006
pokergrandmonaco.net	December 19, 2005
grandmonaco.org	December 19, 2005
casinograndmonaco.org	December 19, 2005
grandmonacocasino.org	December 19, 2005
grandmonacocasinoclub.org	December 21, 2005
grandmonacomillions.org	December 21, 2005
grandmonacopoker.org	December 19, 2005
grandmonacopokerclub.org	December 21, 2005
grandmonacoracebook.org	February 3, 2006
pokergrandmonaco.org	December 19, 2005

All the registration agreements incorporate the Policy. A true and correct copy of the Policy that applies to the domain names in question is provided as Annex [B] to this Complaint.

V. Factual and Legal Grounds

(Policy, paras. 4(a), (b), (c); Rules, para. 3)

[11.] This Complaint is based on the following grounds:

A. The domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

(Policy, para. 4(a)(i), Rules, paras. 3(b)(viii), (b)(ix)(1))

- The Société des Bains de Mer has been operating the Casino de Monte Carlo in Monaco for more than 140 years at the date of this complaint. The casino has become famous worldwide as one of the most significant symbols of the Principauté de Monaco. It attracts a clientele that comes from numerous European and non-European countries.
- The Société des Bains de Mer is the founder and manager of the Casino de Monte Carlo in Monaco. Since April 2, 1863, the Société des Bains de Mer has been granted by the authorities of the Principauté de Monaco a

monopoly for casino and gambling industries for the territory of the Principauté de Monaco, and is therefore the sole company that can organize games and gambling in Monaco (*Privilège des Jeux*, renewed for the last time by the *Ordonnance Souveraine* n°8834 of 24 March 1987, a copy of this *Ordonnance* is attached in Annex [C]).

- Complainant has registered several trademarks including the international word mark "Casino de Monaco" which was registered on 19 December 2002; see Annex [D], and the comparable United States Federal trademark application filed on 24 December 2002 placed as Annex [E].
- All the disputed domains are confusingly similar to the Complainant's trademarks. They all contain the terms "Grand" and "Monaco" and many of them include an additional term:

(1) The domain names composed of the terms "Grand", "Monaco" and "Casino"

This concerns the following disputed domain names:

- casinograndmonaco.com
- grandmonacocasino.com
- grand-monaco-casino.com
- casinograndmonaco.net
- grandmonacocasino.net
- casinograndmonaco.org
- grandmonacocasino.org

These domain names are confusingly similar to the Complainant's trademark as they incorporate both nouns, "Casino" and "Monaco", of Complainant's trademarks. Having inverted the order of the nouns in the mark does not render the following disputed domain names dissimilar from the Complainant's trademarks: grandmonacocasino.com; grand-monaco-casino.com; grandmonacocasino.net and grandmonacocasino.org. The inversion merely reflects a difference in usage or placement of the adjectively used noun (Monaco) in relation to the principal noun (casino) between the French and the English language. The WIPO Panel arrived to a

Exhibit C-5



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Casino de monaco



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CASINO DE MONACO

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Trademark name :

CASINO DE MONACO

Drawing type :

WO - Word(s)/Letter(s)/Number(s)

Mark type :

Trademark / Service Mark

Register :

Principal Register

Active :

Yes

Legal Status :

686 : Published for Opposition (2005-03-01)

Extra status data :

Special Entry for Section 2(f) / Foreign Application Info and Priority Claimed under Section 44(d) / Originally Filed as an Intent to Use Application / Some Use Amendment or Statement Not yet Accepted / contained claim based on foreign filing priority under Section 44(d) / claim based on a live foreign registration under Section 44(e) and/or sec 44(d) priority claim perfected by filing a foreign registration certificate

Filing Date :

2002-12-24

Serial Number :

US 76478796

Published for opposition date :

2005-03-01

Expiry date :

2012-12-24

Internal class :

CL09; CL16; CL28; CL41

National classes :

US02; US05; US21; US22; US23; US26; US29; US36; US37; US38; US50; US100; US101; US107

Goods and services :

CL 9: electric apparatus and instruments, namely computerized video games for gaming purposes, interactive video games of virtual reality comprised of computer hardware and software, machines for playing games of chance, computer software games, software for use in gaming machines and gaming equipment, gaming equipment namely gaming machines, slot machines, keno and poker machines, coin changers, coin accepters for separating good coins from counterfeits; photographic apparatus; controlling and signaling apparatus used in casinos; apparatus for recording, transmission, reproduction of sound or images, namely radio apparatus, video screen, video cameras; calculators, data processing equipment, namely communication servers, communication software for connecting global computer networks, computer cameras, computer game software, computer ecommerce software to allow users to perform electronic business transactions via a global computer network and computers; fire extinguishers

CL 16: printed matter, namely blank or partially printed postcards, printed invitations, printed menus, printed paper signs, menu boards, printed timetables, books, magazines, catalogues featuring casino, hotel and international news, tourism; bookbindings; photographs, stationery; adhesives tapes for stationery or household purposes; artists' materials, namely pencils, pens, brushes, paint brushes; typewriters and office requisites, namely typewriter typing elements, rubber bands, staplers; printed instructional, educational, and teaching materials used in hotels and casinos for teaching different games; plastic materials for packaging, namely bags for packaging, tubs for consumer products, plastic films used as packaging for food, envelopes, pouches for merchandise packaging; printers' type; printing blocks

CL 28: games and playthings, namely playing cards, board games, card games, coin-operated

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Casino de monaco

video games, disposable ticket sets for playing games of chance, hand held units for playing electronic and video games, lottery games, dominos, parlor games, European roulette, American roulette, video poker, poker game and boule game; gymnastic and sporting articles, namely golf bags and balls, sport balls, play swimming pools, swimming equipment, gymnastic apparatus, gymnastic training stools, portable support stretching for dance and other exercises and tennis equipment; decoration for Christmas trees

CL 41: organizing community sporting and cultural activities; providing casino services within a hotel resort environment; training for the personnel employed in casinos in the use and operation of slot machines and cinema equipment; conducting educational entertainment exhibits in the nature of cooking demonstrations; entertainment services in the nature of opera, namely, organizing, producing and presenting live musical, orchestral and operative shows; organizing sporting events in the nature of car racing, tennis tournaments, golf tournaments, and swimming competitions

Owner Name (current) :

SOCIETE ANONYME DES BAINS DE MER ET DU C - ERCLE DES ETRANGERS A MONACO

Owner :

Place du Casino MC 9800 Monte Carlo

Owner country :

NATION: MC

Agent :

ATOR: Martin P. Hoffman

DOMAT: Martin P. Hoffman

Corres/Mail Addr: MARTIN P. HOFFMAN - HOFFMAN, WASSON & GITLER, PC - 2361 JEFFERSON DAVIS HIGHWAY, SUITE 522 ARLINGTON, VA 22202

Owner (history) :Orig. Applicant: SOCIETE ANONYME DES BAINS DE MER ET DU C - ERCLE DES ETRANGERS A MONACO
Place du Casino MC 9800 Monte Carlo
NATION: MC**Foreign priority :**

(Claimed) MC APN 23610 APD 2002-07-01 RGN 2.23234 RGD 2002-09-30 XPD 2012-07-01

Foreign extension :

(Claimed); CTRY : MONACO

APN : 23610 APD : 2002-07-01

RGN : 2.23234 RGD : 2002-07-01

Disclaimer :

No claim is made to the exclusive right to use CASINO, apart from the mark as shown.

Translation :

The English translation of CASINO DE MONACO is Casino of Monaco.

History of the trademark :

2005-03-01 681 : Publication/Issue Review completed (2004-12-27)

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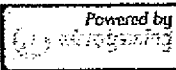
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Feb. - Avalon - Dolphin
Tale - €6 000

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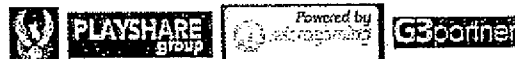
BLACKJACK

ATMELDOKER

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Voir les documents

Historique

Pré-visualiser le coût

Tout sélectionner	Tout désélectionner	Bases de données	Réponses
<input type="checkbox"/>	<input type="checkbox"/>	Marques allemandes	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques autrichiennes	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques du Bénélux	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques canadiens	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques communautaires	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques danoises	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques espagnoles	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques d'état US (Service AvantIQ)	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques fédérales US	0
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<input type="checkbox"/>	<input type="checkbox"/>	Marques françaises	0
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<input type="checkbox"/>	<input type="checkbox"/>	Marques italiennes	0
<input type="checkbox"/>	<input type="checkbox"/>	Marques du Liechtenstein	0

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<input type="checkbox"/> Marques françaises	0
<input type="checkbox"/> Marques hongroises	0
<input type="checkbox"/> Marques internationales	0
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<input type="checkbox"/> Marques du Liechtenstein	0
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<input type="checkbox"/> Marques mexicaines (Service AvantIQ)	0
<input type="checkbox"/> Marques monégasques	0
<input type="checkbox"/> Marques norvégiennes (Service AvantIQ)	0
<input type="checkbox"/> Marques polonaises	0
<input type="checkbox"/> Marques du Royaume Uni	0
<input type="checkbox"/> Marques suédoises	0
<input type="checkbox"/> Marques suisses	0
<input type="checkbox"/> Marques tchèques	0
Nombre total de réponses:	0

Coût de votre recherche : 1,00 EUR
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Tout sélectionner Tout désélectionner

Bases de données Réponses

<input type="checkbox"/> Marques allemandes	0
<input type="checkbox"/> Marques autrichiennes	0
<input type="checkbox"/> Marques du Bénélux	0
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<input type="checkbox"/> Marques fédérales US	0
<input type="checkbox"/> Marques finlandaises (Service AvantIQ)	0
<input type="checkbox"/> Marques françaises	0
<input type="checkbox"/> Marques hongroises	0
<input type="checkbox"/> Marques internationales	0
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<input type="checkbox"/> Marques polonaises	0
<input type="checkbox"/> Marques du Royaume Uni	0
<input type="checkbox"/> Marques suédoises	0
<input type="checkbox"/> Marques suisses	0
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PlayShare PLC Launches

New parent company of PokerShare & CasinoShare integrates its operating platform.

London, UK (PRWEB) October 12, 2006 – PlayShare.com (www.playshare.com) is the new integrated operating platform behind the world class poker and casino gaming sites PokerShare.com and CasinoShare.com. A UK public company, PlayShare is committed to providing the very best online experience, integrating two of their best-known sites so that the more you play the more you earn. PlayShare was created to develop these flourishing and unique gaming sites to the maximum, establishing a clear focal point for partners, customers, and investors alike.

This exciting new gaming platform gives back to its players like no other gaming site and with offices in five countries across three continents you know you are in good hands. Additionally, in light of recent US legislation passed by Congress on 30th September 2006, (Internet Gambling bill – Port Security bill), PlayShare wants customers to know that they are continuing to provide award winning poker and casino entertainment online – it's business as usual with no interruption of service to PlayShare's online casino or poker sites.

Players will benefit from a number of new and exciting products exclusive to the new platform such as a truly innovative rewards program with the most creative loyalty scheme in the industry. Enhancements are comprised of "beginners' tables" which include "micro-limit tables," low buy-in tables, \$50/\$100 and \$100/\$200 tables. A common account and a shared purse offer players a unified experience – the intelligent choice for intelligent poker players.

Lucan Toh, CEO, PlayShare.com, explains that PlayShare.com offers an improved playing experience for Casino and Poker customers. It also means we now have a clear, centralized location from which to develop further unique and successful gaming sites. We're even more excited about what's planned for the next six months – stay tuned!"

For further information please contact:
Melissa Ross
Lyceum Media
+44 (0)207 953 4026

About PlayShare.com

Using unparalleled, cutting-edge technology, PlayShare.com PLC is a public UK Company that owns and operates CasinoShare.com, PokerShare.com and MonkeyShare.net. Licensed by the Kahnawake Gaming Commission through its parent company, GameShare Limited, this is the brand new online gaming experience contributing more to its players than any other online gaming site.

###

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Microgaming Casino News

Microgaming News



PlayShare acquires Grand Gaming Group

ii

20 Nov 2006

PlayShare acquires Grand Gaming Group

ii

SOURCE: PlayShare and G3Partner

On the 1st of November, 2006, PlayShare PLC acquired the Grand Gaming Group, which comprises Grand Monaco Casino and the G3 Partner affiliate program. Hailed in gaming circles as the two most watched groups, the merger is in line with the ambitions of PlayShare to be one of the top 5 gaming companies within the next two years.

About PlayShare

PlayShare PLC is a UK Public Company that owns and operates CasinoShare.com and PokerShare.com.

PlayShare has offices in 5 countries across 3 continents, ensuring unrivalled service to players and partners alike. PlayShare is licensed by the Kahnawake Gaming Commission through its parent company, GamShare Limited. All gaming products are powered by Microgaming™ the best in the business. They are committed to providing a trustworthy and secure gaming environment for all our customers.

CasinoShare offers new player 100% up to \$250 bonus and \$100 monthly bonus. More details about this casino please click here and review this casino.

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About Grand Gaming Group

G3 Partner is a Grand Gaming Group company. This group business people have years of marketing and casino operations experience both online and offline. This makes the Grand Gaming Group one of the most seasoned and talented companies in our industry.

Their management has worked for such land-based casino organizations as Harrah's Entertainment Company and Mirage Resorts. They want you to have the peace of mind that you are working with top industry professionals. They know how to treat casino customers because we have been doing it for years. Have confidence that your players are guaranteed a fun-filled gaming experience.

Grand Gaming Group comprises Grand Monaco Casino which offers new player 100% up to \$150 bonus. More details about this casino please click here and review this casino.



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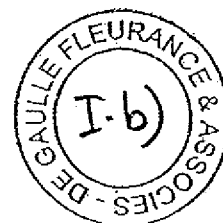
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PlayShare Players to Experience Oneness

14-09-06

September 14, 2006 (London, UK) - PlayShare Ltd is looking to offer everyone who plays on its sites the true experience of oneness. Before the end of the year, the company plans to introduce the one wallet solution which will offer players a totally seamless gaming experience between its CasinoShare and PokerShare sites.

Players who want to enjoy the excitement of both sites, but don't want to have to log out of one site and into the other to play different games or to check on their balance, will be able to switch easily between games and between sites.

This seamless integration of the poker and casino platforms will not only make gaming so much easier but will also allow players to benefit from a variety of bonus systems that operate on both sites. Players will also gain significantly from the CasinoShare loyalty system by being able to hop easily between the sites.

Max Wright, Director, PokerShare.com/CasinoShare.com says: "With 24hr support, top-level security, and convenient payment and withdrawal options, CasinoShare has always offered players a world-class casino that delivers a truly exceptional mixture of excitement and fun. CasinoShare provides the most exciting online casino experience available and is a perfect partner to the already, hugely successful PokerShare."

He adds: "And now it's about to get a whole lot better. The one wallet system will make both our sites incredibly easy to use and move around and, will offer our players a genuine zen-like experience, because oneness is zen. When this system is in place, players will be able to concentrate fully on enjoying themselves and not waste valuable time logging into and out of sites to switch games or check balances. It's going to take playing on our sites to a whole new level."

There are over 300 games to choose from at CasinoShare.com with some of the biggest progressive jackpots to be found on the net. Visitors to the CasinoShare website can take advantage of an attractive sign-up offer currently on offer and ultimately, enjoy a unique rewards program, which will be the first of its kind in the online casino industry. CasinoShare.com offers players trips to land-based casinos (in Las Vegas, Atlantic City, Monte Carlo, Macau, London & also Casino Cruises). Players will enjoy complimentary accommodation in some of the best casino hotels in the world. Additionally, CasinoShare's rewards team are on hand to provide show tickets, dinner, golf and spa reservations.

ENDS

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About PlayShare.com

PlayShare.com is the driving force behind the brands PokerShare.com, CasinoShare.com and MonkeyShare.net. PlayShare PLC is a UK company and the owner of GamShare Ltd, a Gibraltar-based gaming operator, licensed in Kahnawake, Canada.

About PokerShare.com

Poker Share is the first poker site in the world to offer its players the opportunity to share in its success, through the Poker Share Trust. The trust has the ultimate benefit of 40% ownership of PokerShare.com. It receives cash every month which is used to rewards players through the Poker Share Trust Loyalty Store. What's more, if PokerShare.com floats on the stock exchange or is bought by another company, the players are rewarded.

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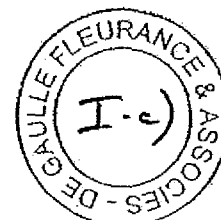
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WinOne launches GemScope at 3GSM
World Congress, Barcelona

13-02-07
**5th European Casino Affiliate
Convention Held May 3-5**
CAC2007 Amsterdam is expected to be
larger than any previous year



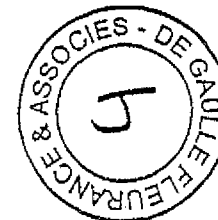
Depending on the total number of share points accumulated, players will receive cash from the Poker Share Trust.

About CasinoShare.com

CasinoShare.com is owned and operated by GamShare Ltd and is powered by Isle of Man based Microgaming.

PokerShare.com and CasinoShare.com are operated by Playit Ownit Ltd and licensed by the Kahnawake Gaming Commission through its parent company, GamShare Ltd. Both GamShare Ltd and Playit Ownit Ltd are based in Gibraltar.

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WIPO CASES FOR « LA SOCIETE DES BAINS DE MER »

	Case number	Complainant	Respondent	Domain names	Decision
1	D2000-1315	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Britannia Finance	monacocasinos.com montecarlocasinos.net thecasinomontecarlo.com themonotecarlocasino.com	Transfer
2	D2000-1316	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Thomas Proud	casinodemonaco.com	Transfer
3	D2000-1317	Société des Bains de Mer et du Cercle des Etrangers à Monaco	Internet Marketing Associates	casinomonaco.com	Transfer
4	D2000-1318	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Martini BT	casino-monaco.com	Complaint denied
5	D2000-1319	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Joaquin Edo	casinomonaco.net	Transfer
6	D2000-1320	La Société des Bains de Mer	Gest Trading S.R.L.	casino-montecarlo.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		et du Cercle des Etrangers à Monaco			
7	D2000-1321	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Worldnet Companies inc.	casino-monte-carlo.net	Transfer
8	D2000-1322	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Externet World Inc.	montecarlo-casino.net montecarlo-casino.org	Transfer
9	D2000-1323	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	I. Bancorp Europe	casinosmontecarlo.com e-montecarlocasino.com monte-carlo-casino.com montecarlo-casino.com montecarlocasino.net montecarlocasino.org	Transfer
10	D2000-1324	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Iggi Networks Media Group	casinodemonaco.net casinoofmonaco.com	Transfer
11	D2000-1325	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Integroweb (Bahamas) Ltd.	casino-of-monaco.com casino-of-montecarlo.com	Transfer
12	D2000-1326	La Société des Bains de Mer et du Cercle	International Lotteries	casinomontecatlo.com montecarlocasinos.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		des Etrangers à Monaco			
13	D2000-1327	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	International Lotteries	casinodemontecarlo.com casinomonte-carlo.com casinomontecarlo.net casinomontecarlo.org e-casinomontecarlo.com lecasinodemontecarlo.com lecasinomontecarlo.com lemontecarlocasino.com monte-carlocasino.com montecarlogambling.com	Transfer
14	D2000-1328	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	International Services Inc.	casinodemontecarlo.net casino-montecarlo.net casinomonte-carlo.net casinomontecarloonline.com casinomonte-carlo.org casinosmontecarlo.net casinosmontecarlo.org ecasinomontecarlo.com e-casinomontecarlo.net ecasinomontecarlo.net emontecarlocasino.com e-montecarlocasino.net emontecarlocasino.net lemontecarlocasino.net livemonacocasino.com monacogaming.com monacogaming.net monte-carlocasino.net montecarlocasinoonline.com montecarlocasinoonline.net	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
				montecarlogambling.net montecarlogames.com montecarlogames.net montecarlojackpot.com montecarlojackpot.net montecarloonlinecasino.com montecarloonlinecasino.net sexycasinomontecarlo.com sexymontecarlocasino.com sexymontecarlocasino.net webcasinomontecarlo.com	
15	D2000-1329	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Casino On-Line	monacocasino.com	Transfer
16	D2000-1330	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Netrider	monaco-casino.com	Transfer
17	D2000-1331	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	World Casino Company	monacocasino.net	Transfer
18	D2000-1332	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Global Productions -- Domain for Sale	monacogambling.com	Transfer
19	D2000-1333	La Société des	Piranha	montecarlocasino.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		Bains de Mer et du Cercle des Etrangers à Monaco	Interactive Ltd.		
20	D 2003-0985	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Internet Billions Domains Inc.	casinomontecarlo.org e-casinomontecarlo.com lecasinodemontecarlo.com monte-carlocasino.com montecarlocasinos.net sexcasinomontecarlo.com sexcasinomontecarlo.net sexymontecarlocasino.com sexymontecarlocasino.net thecasinomontecarlo.com	Transfer
21	D2004-0454	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	BestCreative	montecarlo-casinos.com	Transfer
22	D2004-0415	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Aucun	monte-carlocasinos.net monte-carlogrand.com montecarloroyale.com monte-carlosuncasino.com montecarlosuncasino.com suncasino-monte-carlo.com suncasino-montecarlo.com	Transfer
23	D2005-0225	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Montecarlo Development, LLC.	montecarlocasinoandsportsbook.com	Transfer
24	D2005-0338	La Société des	Montecarlo	montecarlo-onlinecasino.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		Bains de Mer et du Cercle des Etrangers à Monaco	Online Casino (MOC)		
25	D2005-0339	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Netsymmetrics	online-casinos-montecarlo.com online-casino-montecarlo.com	Transfer
26	D2005-0403			casinobestmontecarlo.com	Terminated : amicable transfer
27	D2005-0404	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Integrity Ltd.	luckymontecarlocasino.com	Transfer
28	D2005-0439			montecarlohotelandcasino.com	Terminated : amicable transfer
29	D2005-0440			montecarlocasinohotel.com montecarlocasinovegas.com	Terminated : amicable transfer
30	D2005-0526	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	LaPorte Holdings, LLC	montecarloresortandcasino.com	Transfer
31	D2005-0527	La Société des Bains de Mer et du Cercle des Etrangers	Domain Active Pty. Ltd	montecarloresortcasino.com	Transfer

	Case number	Complainant	Respondent	Domain names	Decision
		à Monaco			
32	D2005-1342	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Corril Holding	montecarlograndcasino.com grandcasinomontecarlo.com	Transfer
33	D2005-1343	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Michael Ditursi	montecarlointernationalcasino.com	Transfer
34	D2006-0289	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Empire Online Ltd	monacogoldcasino.com	Transfer
35	D2006-1245	La Société des Bains de Mer et du Cercle des Etrangers à Monaco	Mark Bolet	monaconetcasino.com	Transfer

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G3 REWARDS CLUB



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At Grand Monaco, you can be confident you are playing in a world class casino with world class service. Below you will find some of the benefits we offer our players.

Benefits

[How to become a member](#)

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The Benefits

You receive many valuable benefits including:

- **FREE membership**
- Automatic point earnings and cash back services
- Belong to the Grand Gaming Group
- Earn valuable G3 Points for our Cash Back Rewards program
- Tiered slot bonus rewards
- Earn comps, cash, and offers based on play
- Weekly G3 Point multiplier days
- Exclusive personalized promotions and invitations
- **It's simple but rewarding!**

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How to become a member

Membership to the G3 Players Club is FREE and given to all Grand Monaco players for registering a real player account.

Your membership account number = Your real casino account number

Your membership password = Your real casino password

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How to earn G3 Cash Back rewards

- After registering and making your first purchase at Grand Monaco, your membership includes 2,000 G3 Points for free.
- A further 5,000 FREE points are yours by making ANY first webwallet purchase of \$50 or more.
- Additional G3 Points are earned every time you make a bet.
- The more you play, the faster you earn G3 Points.
- Various promotions offer G3 Points to players.
- Grand Monaco rewards slot players with additional Bonus G3 Points based on the Slot Tier Level achieved each month.

Points calculation

G3 Points may be redeemed in units of 5,000 where 5,000 points = \$5.00 Casino Bonus credits.

Amount Wagered	Points Earned	Games
\$1	1 point	Slots, Keno, Scratch Games
\$3	1 point	All other games

How to redeem your G3 points

Grand Monaco delivers world class service, so we made it easy for players to get their well deserved rewards - fast.

Redeem your G3 Points easily:

1. Players can redeem G3 Points into Casino Bonus Credits at any time by following these easy steps:



Click on any of the G3 Rewards Club links in the casino software



G3 Points are redeemed and deposited in the form of Bonus Credits into your casino bonus account. You can use these credits in the casino or cash them out in accordance with the bonus system requirements.

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Special bonuses

1. Monthly slot bonuses

At Grand Monaco we have something extra special for our slot players:

- You qualify for additional MONTHLY bonuses depending on your Slot Bonus Status Level determined from the previous month's slot play.
 - This bonus level and additional bonus points are recalculated every month based on the previous month's slot wagering activity.
- See chart below.

Slots monthly bonus levels

Level	Monthly Slot	Additional Bonus
-------	--------------	------------------

Member	Wagering	
	0 - \$5,000	-
Silver	\$5,001 - \$25,000	10%
Gold	\$25,001 - \$50,000	15%
Platinum	\$50,001 - \$75,000	20%
Diamond	\$75,001 and up	25%

How it works:

Month	Amount Wagered	Additional bonus player qualifies for:	Additional Bonus G3 Points + Base G3Points:
1	\$50,000	Gold Level - 15%	+ 50,000 pts
2	\$25,000	Silver Level - 10%	15% bonus x 25,000 = 3,750 + 25,000 pts
3	\$5,000	No bonus Level	10% bonus x 5,000 = 500 + 5,000 pts
4	\$15,000	Silver Level - 10%	No bonus added + 15,000 pts

(Remember: \$1 slot wagered = 1 point)

Explanation:

- A Player wagers a total of \$50,000 on Slots in Month 1.
- The Player will qualify for additional Slot Bonus in Month 2 based on the \$50,000 wagered in month 1.
- The Level qualified for is **Gold Level**, which earns an additional 15% bonus on **SLOTS play** in Month 2.
- If the player wagers \$25,000 on Slots in Month 2, then he gets a slot bonus of 3,750 (\$25,000 x 15%).
- This slot bonus is added automatically in his Bonus Account at the end of Month 2.

2. Other regular bonuses

For ALL players, the G3 Rewards Club offers the following special privileges:

- Regular purchase match offers
- Regular mailings with special offers
- Birthday bonus offers
- Special banking services
- Higher bonus offers
- Gifts and other very special treatments
- Casino tournament invitations
- Discretionary bonuses by casino management

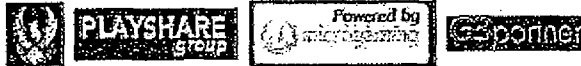
All purchase match offers require players to use our "Claim your Bonus" redemption process. A player can claim a bonus ANY time after receiving an invitation. All free money credits are automatically deposited into the player's casino Bonus Account in accordance with the specific promotion terms and after the offer requirements have been met and bonus claimed.

Points expiry

G3 Points expire after 6 calendar months of being issued.

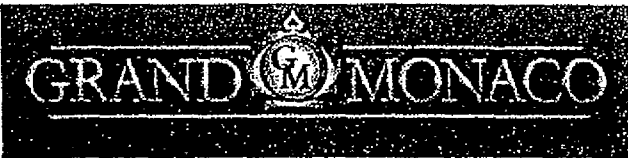
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Grand Monaco is a Hillstead Limited, Gibraltar site - now a member of the PlayShare group
Grand Monaco is in NO way associated with the Principality of Monaco, nor ANY of the
land-based casino operations located in that jurisdiction. Grand Monaco is an independent operation.

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Casino Games Bonus
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**INSTANT PLAY
NO DOWNLOAD**

HOW TO WITHDRAW

Well Done. You're a winner and now we promise to process your cash-in as quickly as possible.

To make a withdrawal follow the steps:

- Login to your Grand Monaco account
- Click on the Bank button
- Click on the Withdrawal button
- Enter the amount you wish to withdraw in the box.

You can now check the status of your withdrawals at any time by clicking on the Cashcheck icon in the casino software.



Please note that the minimum withdrawal amount is \$50.00.

You can reverse a withdrawal (or portion there-of) back to your gaming account within 24 hours after you've requested your original withdrawal. Simply click the REVERSE WITHDRAWAL TAB in the casino software. Your withdrawal is sent to our processing department after the 24 hour reverse withdrawal period has elapsed. You are notified by Email once your Cash Out Request has been completed and the funds have been transferred to you.

It is our policy to refund withdrawals to the same account or mechanism that the original purchase was made, up to the value of your original deposits. However, not all purchase mechanisms facilitate refunds of cash withdrawals and in such cases balances will be paid to the payment option of YOUR choice (see **Withdrawal Options**).

Please note: When a customer makes their first cash-in, a large withdrawal or changes to payment options, Grand Monaco reserves the right to use security measures to ensure you are the rightful recipient of the funds. This is for casino player protection and may require you to send documentation (utility bills, copy of ID, Copy of credit card used to effect purchases). We may ask you sign a list of your previous purchases to your Grand Monaco Account. Again, these measures protect your money and your privacy, but may result in small delays of receiving your money. We apologize for any inconvenience this may cause and will make every attempt to keep the process short.

Should you have any queries about the status of your cash out, please contact one of our **Customer Support** agents.



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INSTALLING THE SOFTWARE

How do I download the free casino software?

What do I do once the download is complete?

Where did I download the file to?

What is the installation file called?

What are the minimum system requirements?

How do I download the free casino software?

Click on any 'Download' button that appears on every page. This will start the process explained on the download page you arrive at.

What do I do once the download is complete?

The File Download dialogue box will launch and guide you through the installation process. Follow the prompts by clicking "Next >" when requested and the casino software will install.

If you are using Firefox or a browser other than Microsoft Internet Explorer, then the setup file would have been downloaded to the location that you selected. To install the Grand Monaco software, double-click on the setup file you downloaded. The install Wizard will guide you through the installation process. Follow the prompts by clicking "Next >" when requested and the casino software will install.

Where did I download the file to?

The default location is to your desktop. If you saved the casino software to an alternative location and cannot find it, simply follow these instructions: Click on 'Start'/'Find'/'Find files or folders'. Type GrandMonaco_0Game_W3.exe in the 'Name' field, and click on 'Find now'. Remember to search by using the 'Local hard drives' option. Once you have found the casino software, double-click to begin the installation.

[Back to top](#)

What is the installation file called?

GrandMonaco_0Game_W3.exe

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What are the minimum system requirements?

Pentium II 333 Mhz
32 Bit operating system Windows 95/98/2000/NT/ME/XP
32 MB RAM
25 MB available hard drive space
Internet connection

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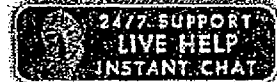
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Read more about our industry leading casino offers below.



Claim your Opening Offer Bonus and Casino Kit

Come back to this page once you have made your first deposit and met the 1x wagering requirements. Enter your name, e-mail address and Real Account number and submit.

Your Name

Your E-mail Address

Real Acct. Number
e.g. vgm00095764

Very Important:

By claiming the Opening Offer, you agree to the **terms and conditions**. The Opening Offer is provided to first time players to enhance the gaming experience with increased gaming time. Attempts to take advantage of bonuses beyond this spirit may be deemed as **promotion abuse**.

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100% Slot Match Bonus up to \$150 FREE

OR

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register an account, and make a Deposit

step

1



step

2

Choose your Bonus by
wagering your deposit once
(1 X) on the games of your choice



Slots Only

OR



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step

3

Claim your Opening Offer
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OR

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The opening offer bonus is credited to your bonus account in less than 4 hours from the time you've met the conditions and claimed your offer.

Remember:

- Our conditions require you to wager the original purchase one time to determine whether you are accepting the slot or games offer.
- Cashing in prior to receiving your 100% bonus match credits forfeits the free credits.
- If you wager on a mix of slots and casino games, then you have accepted the casino game offer of up to \$75 Free.
- After receiving your opening offer free credits, you may not cash-in until you have met the minimum bets and wagering requirements.

[Click here](#) to see the Opening Offer Terms & Conditions detail.

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2. FREE Membership into the G3 Rewards Club - No Registration Required!
3. FREE Subscription to our monthly newsletter - *Grand News*
4. FREE Web Wallet Bonus!
5. FREE \$5,000 Progressive Jackpot Reward!

Grand Monaco offers all new purchasing players the chance to try world-class gaming with a world-class welcome!

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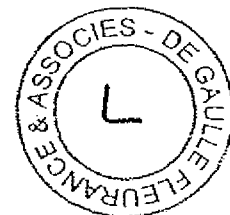


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grand-monaco.com
grandmonaco.com
grandmonacocraps.com
grandmonacogames.com
grandmonacogames.net
grandmonacogaming.com
grandmonacogaming.net
grandmonacohost.com
grandmonacohosts.com
grandmonacolottery.com
grandmonacolottery.net
grandmonacolotto.com
grandmonacolounge.com
grandmonacomahjong.com
grandmonacomillions.com
grandmonacomillions.net
grandmonacomillions.org
grandmonaco.net
grandmonaconews.com
grandmonacoonlinecasino.com
grandmonacoonlinegaming.com
grandmonacoonlinepoker.com

grandmonaco.org
grandmonacopartners.com
grandmonacoplayersclub.com
grandmonacoplayersclub.net
grandmonacopokerclub.com
grandmonacopokerclub.net
grandmonacopokerclub.org
grand-monaco-poker.com
grandmonacopoker.com
grandmonacopoker.net
grandmonacopoker.org
grandmonacopromotions.com
grandmonacoracebook.com
grandmonacoracebook.net
grandmonacoracebook.org
grandmonacorewards.com
grandmonacoskillgames.com
grandmonacoskillgames.net
grandmonacoslots.com
grandmonacosportsbook.com
grandmonacosportsbook.net
grandmonacosports.com
grandmonacosports.net
grandmonacostore.com
grandmonacosupport.com
grandmonacovideopoker.com
pokergrandmonaco.net
pokergrandmonaco.org>
Notification of Decision

Please find attached the full text of the decision issued on May 25, 2007 by the Administrative Panel in the above-referenced case.

The Administrative Panel's finding is as follows:

For all the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the domain names

<casinograndmonaco.com>
<casinograndmonaco.net>
<casinograndmonaco.org>
<deutschesgrandmonaco.com>
<grandmonacoayda.com>
<grandmonacoayuda.com>
<grandmonacobingo.com>
<grandmonacobingo.net>
<grandmonacocasinoclub.com>
<grandmonacocasinoclub.net>
<grandmonacocasinoclub.org>

<grand-monaco-casino.com>
<grandmonacocasino.com>
<grandmonacocasino.net>
<grandmonacocasino.org>
<grandmonacoclub.com>
<grand-monaco.com>
<grandmonaco.com>
<grandmonacoeraps.com>
<grandmonacogames.com>
<grandmonacogames.net>
<grandmonacogaming.com>
<grandmonacogaming.net>
<grandmonacohost.com>
<grandmonacohosts.com>
<grandmonacolottery.com>
<grandmonacolottery.net>
<grandmonacolotto.com>
<grandmonacolounge.com>
<grandmonacomahjong.com>
<grandmonacomillions.com>
<grandmonacomillions.net>
<grandmonacomillions.org>
<grandmonaco.net>
<grandmonaconews.com>
<grandmonacoonlinecasino.com>
<grandmonacoonlinegaming.com>
<grandmonacoonlinepoker.com>
<grandmonaco.org>
<grandmonacopartners.com>
<grandmonacoplayersclub.com>
<grandmonacoplayersclub.net>
<grandmonacopokerclub.com>
<grandmonacopokerclub.net>

<grandmonacopokerclub.org>
<grand-monaco-poker.com>
<grandmonacopoker.com>
<grandmonacopoker.net>
<grandmonacopoker.org>
<grandmonacopromotions.com>
<grandmonacoracebook.com>
<grandmonacoracebook.net>
<grandmonacoracebook.org>
<grandmonacorewards.com>
<grandmonacoskillgames.com>
<grandmonacoskillgames.net>
<grandmonacoslots.com>
<grandmonacosportsbook.com>
<grandmonacosportsbook.net>
<grandmonacosports.com>
<grandmonacosports.net>
<grandmonacostore.com>

4.

<grandmonacosupport.com>
<grandmonacovideopoker.com>
<pokergrandmonaco.net>>
<pokergrandmonaco.org>

be transferred to the Complainant.

Pursuant to Paragraph 4(k) of the Uniform Domain Name Dispute Resolution Policy, the Registrar identified below shall proceed to implement the above decision on the tenth business day (as observed in the location of that Registrar's principal office) after receiving this notification. The concerned Registrar will not implement the decision if, before the 10-day waiting period has expired, the Respondent submits official documentation (such as a copy of a complaint, file-stamped by the clerk of the court) to the Registrar demonstrating that it has commenced a legal proceeding against the Complainant in a jurisdiction to which the Complainant has submitted under Paragraph 3(b)(xiii) of the Rules for Uniform Domain Name Dispute Resolution Policy (the *Rules*).

Pursuant to Rules, Paragraph 16(a), the Registrar is directed to inform the Complainant, the Respondent, the Internet Corporation for Assigned Names and Numbers (ICANN) and the WIPO Arbitration and Mediation Center as soon as possible of the specific date on which the Administrative Panel's decision will be implemented, absent a notification by the Respondent in accordance with the above.

Yours sincerely,

Youri Porohovski
Case Manager

COMMUNICATIONS

This notification is being communicated to the Complainant in accordance with the following contact details:

Julien Horn
De Gaulle Fleurance & Associés
11 rue Portalis
75008 Paris
France
33156640000 (Office telephone)
33156640001 (Office FAX)
E-mail: jhorn@dgfla.com

By the following methods:

- ☒ Post/Courier (with original enclosure)
- ☒ E-mail (with attachment)

This notification is being communicated to the Respondent in accordance with the following contact details:

Warner Jerrard
Hamilton Downing Quinn Solicitors
Ruskin House
40/41 Museum Street
London WC1A 1LT
United Kingdom of Great Britain and Northern Ireland
44(0)20 7831 8939 (Office telephone)
44(0)20 7831 8798 (Office FAX)
E-mail: warnerj@hamd.co.uk

By the following methods:

- ☒ Post/Courier (with original enclosure)
- ☒ E-mail (with attachment)

A copy has also been communicated to the Registrar listed below:

Go Daddy Software

By the following methods:

- ☒ E-mail (with attachment)



WIPO Arbitration and Mediation Center

ADMINISTRATIVE PANEL DECISION

**Société des Bains de Mer et du Cercle des Étrangers à Monaco v.
Lucan Toh and Max Wright**

Case No. D2007-0249

1. The Parties

The Complainant is Société des Bains de Mer et du Cercle des Étrangers à Monaco of Monte Carlo, Monaco, represented by De Gaulle Fleurance & Associés, France.

The Respondents are Lucan Toh and Max Wright of London, United Kingdom of Great Britain and Northern Ireland, represented by Hamilton Downing Quinn Solicitors, United Kingdom of Great Britain and Northern Ireland.

2. The Domain Names and Registrar

The disputed domain names

<casinograndmonaco.com>
<casinograndmonaco.net>
<casinograndmonaco.org>
<deutschesgrandmonaco.com>
<grandmonacoayda.com>
<grandmonacoayuda.com>
<grandmonacobingo.com>
<grandmonacobingo.net>
<grandmonacocasinoclub.com>
<grandmonacocasinoclub.net>
<grandmonacocasinoclub.org>
<grand-monaco-casino.com>
<grandmonacocasino.com>
<grandmonacocasino.net>
<grandmonacocasino.org>
<grandmonacoclub.com>
<grand-monaco.com>
<grandmonaco.com>
<grandmonacocraps.com>

<grandmonacogames.com>
<grandmonacogames.net>
<grandmonacogaming.com>
<grandmonacogaming.net>
<grandmonacohost.com>
<grandmonacohosts.com>
<grandmonacolottery.com>
<grandmonacolottery.net>
<grandmonacolotto.com>
<grandmonacolounge.com>
<grandmonacomahjong.com>
<grandmonacomillions.com>
<grandmonacomillions.net>
<grandmonacomillions.org>
<grandmonaco.net>
<grandmonaconews.com>
<grandmonacoonlinecasino.com>
<grandmonacoonlinegaming.com>
<grandmonacoonlinepoker.com>
<grandmonaco.org>
<grandmonacopartners.com>
<grandmonacoplayersclub.com>
<grandmonacoplayersclub.net>
<grandmonacopokerclub.com>
<grandmonacopokerclub.net>
<grandmonacopokerclub.org>
<grand-monaco-poker.com>
<grandmonacopoker.com>
<grandmonacopoker.net>
<grandmonacopoker.org>
<grandmonacopromotions.com>
<grandmonacoracebook.com>
<grandmonacoracebook.net>
<grandmonacoracebook.org>
<grandmonacorewards.com>
<grandmonacoskillgames.com>
<grandmonacoskillgames.net>
<grandmonacoslots.com>
<grandmonacosportsbook.com>
<grandmonacosportsbook.net>
<grandmonacosports.com>
<grandmonacosports.net>
<grandmonacostore.com>
<grandmonacosupport.com>
<grandmonacovideopoker.com>
<pokergrandmonaco.net>
<pokergrandmonaco.org>

are registered with Go Daddy Software.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 20, 2007. On February 23, 2007, the Center first transmitted by email to Go Daddy Software a request for registrar verification in connection with the domain names at issue. On March 15, 2007, Go Daddy Software transmitted by fax to the Center its verification response confirming that the Respondent Lucan Toh is listed for eleven of the domain names as the registrant and providing the contact details for the administrative and technical contact, while stating that the balance of the domain names is registered to the Respondent Max Wright, also providing the contact details for the administrative and technical contact. Go Daddy Software further stated that the domain name registrants have submitted in their Registration Agreements to the jurisdiction at the location of the principal office of the Registrar for court adjudication of disputes concerning or arising from the use of the domain names.

In response to a notification by the Center dated March 19, 2007 that the Complaint was administratively deficient, the Complainant filed an amendment to the Complaint on March 21, 2007. The Center verified that the Complaint together with the amendment to the Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").

In accordance with paragraphs 2(a) and 4(a) of the Rules, the Center formally notified the Respondents of the Complaint, and the proceedings commenced on March 26, 2007. In accordance with paragraph 5(a) of the Rules, the original due date for Response was April 15, 2007. The due date was later on extended to May 1, 2007, with the consent of the Complainant. The Response as well as a statement by the Respondent Max Wright were filed with the Center on April 27, 2007.

The Center appointed Brigitte Joppich as the sole panelist in this matter on May 11, 2007. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with paragraph 7 of the Rules.

On May 11, 2007, the Complainant filed a supplemental communication with the Center (the "Reply"). On May 14, 2007, the Respondents objected to the submission of the Reply and supporting documents. The Complainant replied by arguing why its supplemental submission should be accepted on May 15, 2007, and the Respondents replied by sending two e-mails on May 16, 2007.

4. Factual Background

The Complainant has been operating a casino under the name "Casino de Monte-Carlo" in Monaco for more than 140 years. It is the founder and manager of the Casino of Monte-Carlo. Since April 2, 1863, it has been granted a monopoly for casino and gambling industries for the territory of the Principauté de Monaco by the authorities of the Principauté de Monaco.

The Complainant is the owner amongst others of the international mark CASINO DE MONACO registered on December 19, 2002, filed originally with the Monaco

Trademark Office and enjoying a priority of July 1, 2002. The Complainant also owns the mark CASINO DE MONTE-CARLO which is well-known and enjoys a substantial reputation.

The Respondents and their businesses offer online gambling services. The disputed domain names were registered by the Respondents' predecessor in interest between October 23, 2004 and August 23, 2006. The Respondents' company, PlayShare.com PLC, acquired these domain names as part of an established business with effect from November 1, 2006. The disputed domain name <grandmonaco.com> had been adopted and used for online gambling purposes by a third party as early as 2000.

5. Parties' Contentions

A. Complainant

The Complainant contends that each of the three elements specified in paragraph 4(a) of the Policy are given in the present case:

- (i) The domain names are confusingly similar to the Complainant's mark CASINO DE MONACO as they all contain the terms "Grand" and "Monaco" and many of them include an additional term. The Complainant groups the disputed domain names according to their composition as follows, leaving aside the top level domain name in each case:
 - The confusing similarity of the domain names composed of the terms "Grand", "Monaco" and "Casino" results from the fact that they incorporate both nouns "Monaco" and "Casino" of the Complainant's trademarks, while the addition of the generic term "grand", frequently associated with the casino business, does not detract from such similarity.
 - The confusing similarity of the domain names composed of the terms "Grand", "Monaco", "Casino" and the generic terms "club" or "online" is based on the same line of arguments, strengthened by such additional generic terms that can easily be associated with the Complainant's activities.
 - The domain names composed of the terms "Grand" and "Monaco" also point to the Casino in Monte-Carlo and, as a result, to the Complainant. They are therefore confusingly similar to the Complainant's mark CASINO DE MONACO.
 - The domain names composed of the terms "Grand" and "Monaco" and a generic term related to the casino business as "bingo", "poker", "craps", "games", "lottery", "rewards", "slots", "millions" or other, which strengthens the association with the Complainant's famous casino, are to be considered confusingly similar as well. This also applies to the domain names in this category containing the generic terms "sports" or "sportsbook".
 - The domain names composed of the terms "Grand", "Monaco" and a generic term unrelated to the casino business as "host", "club", "promotions", "store" or other are to be judged like the domain names composed only of the terms "Grand" and "Monaco" as such additional

generic terms have no distinctive value. They are confusingly similar to the Complainant's marks as well.

- This also accounts for the domain name <deutschesgrandmonaco.com>, pointing to a German-language casino website, as "deutsches" simply means "German" in German language.
- (ii) The Complainant further contends that the Respondents have no rights or legitimate interests in respect of the domain names as they do not enjoy rights in trademarks including the words "Grand" and "Monaco", have no geographical link with the Principauté de Monaco, have not been licensed or authorized by the Complainant and are not allowed to operate a casino in Monaco.
- (iii) The Complainant finally contends that the domain names were registered and are being used in bad faith as the Respondents are professionals in the gambling business as managers of gaming companies within the PlayShare Group, which is seeking to become one of the top five gaming companies worldwide in the near future. The strong notoriety and world renown of the Complainant's marks can therefore not have gone unknown by the Respondents. This impression is supported by the disclaimer inserted at the bottom of each page under the disputed domain names, pointing out that such site is not related to the Principality of Monaco or any of the land-based casino operations located there. Furthermore, the Respondents are supposed to pass off on the Complainant's trademarks and renown in order to attract Internet users for commercial gain, thus creating a risk of confusion, which is evidence of bad faith registration and use. Most of the disputed domain names point to the same casino website. To the extent that they are inactive, the Respondents must have acquired them to prevent the Complainant from using them – such passive use is also supposed to demonstrate bad faith use and registration under the Policy as use in a legitimate manner cannot be imagined.

The Complainant designates the courts of the United States of America where the Registrar is located as courts of Mutual Jurisdiction under paragraph 3(b)(xiii) of the Rules. The location of the Registrar is Scottsdale, Arizona, United States of America.

B. Respondent

As the Statement by the Respondent Maxwell G. Wright was filed with the Center together with the Response and is referred to therein, the Panel will treat it as part of the Response.

The Respondents contend that none of the three elements specified in paragraph 4(a) of the Policy are given in the present case:

- (i) The domain names are neither confusingly similar to the Complainant's mark CASINO DE MONTE-CARLO nor to the Complainant's mark CASINO DE MONACO as they all include the word "Grand", making them significantly different from the Complainant's marks. Furthermore, none of the disputed domain names incorporates the word "Monte Carlo", while some of them refer to "Monaco" as a geographical term distinct from Monte Carlo. The mark CASINO DE MONACO, however, is *prima facie* unregistrable and has not acquired a secondary meaning. It is not a well-known mark either. On the other side, the disputed domain name <grandmonaco.com> has acquired an independent reputation on account of extensive use for online gambling purposes since it was

first registered in 2000. It must also be taken into account that the Respondents are engaged in online gambling, a very different field of gambling as compared to the Complainant's business. Even to the extent the disputed domain names incorporate the word "casino" they are not confusingly similar to the Complainant's marks. However, the Respondents would agree to the cancellation of such domain names after a period of grace of one month. The Respondents also contend that the Complainant's monopoly to operate casinos in Monaco is not sufficiently known to the Internet users visiting the Respondents' website, who would not expect a connection between this monopoly and such website, and that this monopoly lasted only until April 1, 2007.

- (ii) The Respondents further contend that they do have rights and legitimate interests in respect of the domain names as the domain names have been in legitimate, albeit intermittent, use for gaming purposes since at least July 2000 (in particular, the domain name <grandmonaco.com> was in use for some time in 2000). The Respondents further state that their company PlayShare.com PLC bought the domain names in good faith with effect from November 1, 2006 as part of Grand Gaming Group, an established business that had been trading extensively since June 25, 2006, and that PlayShare.com PLC and its predecessors have made extensive use of the primary names <grandmonaco.com> and <deutschesgrandmonaco.com>, thereby building up a reputation among its customers as proprietors of the name "Grand Monaco", including a network of relationships with agencies and affiliated third parties. The disputed domain names are vital to the Respondents' business and the Respondents would not have acquired Grand Gaming Group had they known of any risk related to the underlying domain names. Finally, the Respondents contend that no adverse inference should be drawn from the disclaimer, which was put in place by the previous owners of the domain names on October 7, 2006.
- (iii) The Respondents finally contend that the domain names were neither registered nor being used in bad faith as there is no reference on the websites under the domain names to the Complainant's business, in particular not its casino. The Respondents claim to enjoy an independent reputation in the name "Grand Monaco", which had been on the Register without being challenged for six years and had been used extensively at various times during such period before the Respondents acquired the disputed domain names. The disputed domain names are based on the geographical word "Monaco" which is not (part of) the Complainant's name. Even if they are part of a registered trademark, geographical names may not be monopolized, especially not if they are particularly attractive because of the glamorous associations they evoke as in the present case.

With regard to subsequent litigation, the Respondents contend that the only courts of Mutual Jurisdiction under paragraph 3(b)(xiii) of the Rules are the courts of England and Wales. They argue that they have not entered into a registration agreement with the registrar but only a *transfer agreement*, which does not include a submission to the courts of the Registrar's location for disputes concerning or arising from the use of the domain name, while the definition of Mutual Jurisdiction as in paragraph 1 of the Rules stipulates that the domain name holder must have submitted in its *registration agreement* to the jurisdiction of the principal office of the Registrar for court adjudication of this type of disputes.

6. Discussion and Findings

The first point to be dealt with is the admissibility of the Complainant's Reply and the relevance of the correspondence stimulated by such supplemental submission.

The Rules do not allow the parties to file supplemental submissions on their own volition and paragraph 12 provides that a Panel may in its sole discretion request further statements or documents from either of the parties. Thus, no party has the right to insist upon the admission of additional arguments or evidence.

Grounds justifying new submissions are above all the existence of new pertinent facts that did not arise until after the complaint was filed. For instance, if the respondent raises objections that could not have been anticipated when the complaint was filed, the panel can give the complainant a right to reply to the submission or may accept the complainant's unsolicited additional submission (see *Universal City Studios, Inc. v. G.A.B. Enterprises*, WIPO Case No. D2000-0416 - <fieldofdreams.com>; *QNX Software Systems Ltd. v. Future Media Architects, Inc. and Thunayan K AL-Ghanim*, WIPO Case No. D2003-0921 - <qnx.info>; *Goldline International, Inc. v. Gold Line*, WIPO Case No. D2000-1151 - <goldline.com>).

The Complainant does not cite any exceptional circumstances necessitating further submissions, nor does the Reply itself disclose any relevant new facts or legal authority not available at the time the Complaint was submitted. Instead, the Complainant appears to have submitted the Reply solely to reciprocate the arguments presented in the Response. Such a reply is not justified under the Rules.

Therefore, the Panel elects not to accept the Complainant's supplemental submission and supporting documents and has not relied on them in reaching this decision. The same applies to the subsequent submissions by both parties.

Second, the Respondents initiated an argument on the competent court of Mutual Jurisdiction. When contending that only the transfer agreement with the Registrar is relevant in this regard, they ignore the fact that the continued registration of disputed domain names with Go Daddy Software is subject to such registrar's registration agreement. According to the Panel's own research, the Transfer Agreement includes a provision submitting transferees to the original domain name registration agreement, as its section 7 reads as follows: "You understand that this is a request for a domain name transfer of registrars. By acceptance of this Transfer Agreement, you are requesting that the domain name registration be transferred from the current registrar to Go Daddy. As the current authorized Registrant of the domain name(s), you agree to authorize this transfer by notifying your Administrative contact of his/her responsibilities with respect to this transfer. You acknowledge that you and Go Daddy have entered into a Domain Name Registration Agreement (hereinafter referred to as 'Registration Agreement'). You have read, understood, and agree to be legally bound by the agreements that govern all domain names registered through Go Daddy as found on the legal agreements page, including the Domain Name Registration Agreement; the dispute policy; this Agreement; any Go Daddy policies and procedures that are or may be published from time to time by Go Daddy, ICANN, and/or the Registry Administrator chosen by ICANN." The registration agreement, in turn, establishes the registrar's location as possible Mutual Jurisdiction, which has therefore validly been selected by the Complainant in this case and confirmed by Go Daddy Software in its communication with the Center dated March 15, 2007. As a result, Mutual Jurisdiction under paragraph 3(b)(xiii) of the Rules lies with the courts of Scottsdale, Arizona, United States of America.

Under paragraph 4(a) of the Policy, the Complainant must prove that each of the following three elements are present:

- (i) the domain name is identical or confusingly similar to the Complainant's trademark; and
- (ii) the Respondent has no rights or legitimate interests in respect of the domain name; and
- (iii) the domain name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

The Respondents question the inherent registrability of the Complainant's mark CASINO DE MONACO. However, as the Complainant submitted evidence of the registration of this mark, its possibly descriptive character is not relevant with respect to the requirements of paragraph 4(a)(i) of the Policy. It is not for the Panel to judge the validity of a trademark registered with an official trademark office (cf. *La Société Anonyme des Bains de Mer et du Cercle des Étrangers à Monaco v. Thomas Proud*, WIPO Case No. D2000-1316 - <casinodemonaco.com>).

In order to compare the disputed domain names to the Complainant's marks, both designations must be compared as a whole (cf. *La Société des Bains de Mer et du Cercle des Étrangers à Monaco v. Martini Bt.*, WIPO Case No. D2000-1318 - <casino-monaco.com>). However, the specific top level domain name is to be left out as it is not an element of distinctiveness that can be taken into consideration when evaluating the identity and similarity of the Complainant's trademark and the disputed domain name (cf. *Magnum Piering, Inc. v. The Mudjacks and Garwood S. Wilson, Sr.*, WIPO Case No. D2000-1525 - <magnumpiering.com> et al.; *Phenimedia AG v. Meta Verzeichnis Com*, WIPO Case No. D2001-0374 - <moor-huhn.com>).

While the Complainant does not enjoy trademark rights in the geographical locations "Monaco" or "Monte-Carlo" as such, it is the combination of these with the term "casino" that distinguishes the Complainant's marks and points to the Complainant's famous casino.

Next to the word "Monaco", the disputed domain names all contain the additional element "grand" that is strongly linked to the gambling industry and, next to the location Monaco, evokes the Casino of Monte-Carlo (cf. *Société des Bains de Mer et du Cercle des Étrangers à Monaco v. None*, WIPO Case No. D2004-0415 - <monte-carlogrand.com> et al.; *Société des Bains de Mer et du Cercle des Étrangers à Monaco v. Corril Holding N.V.*, WIPO Case No. D2005-1342 - <montecarlograndcasino.com>). It is a conceptual similarity that exists here between the Complainant's marks and the disputed domain names. As a general principle, such similarity can be sufficient to find for confusing similarity, even in the absence of a strong visual or phonetical similarity, based on the idea a certain phrase suggests. The domain names <grand-monaco.com>, <grandmonaco.com>, <grandmonaco.net> and <grandmonaco.org> are therefore confusingly similar to the Complainant's mark CASINO DE MONACO.

The rest of the disputed domain names contain further elements. Where the word "casino" is added, the conceptual, visual and phonetical similarity with the Complainant's mark CASINO DE MONACO is even stronger. Thus, the domain names <casinograndmonaco.com>, <casinograndmonaco.net>.

<casinograndmonaco.org>, <grandmonacocasinoclub.com>, <grandmonacocasinoclub.net>, <grandmonacocasinoclub.org>, <grand-monaco-casino.com>, <grandmonacocasino.com>, <grandmonacocasino.net> and <grandmonacocasino.org> are also confusingly similar to the Complainant's mark CASINO DE MONACO.

Finally, there are the disputed domain names containing "Monaco", "grand" and additional generic elements, i.e. <deutschesgrandmonaco.com>, <grandmonacoayda.com>, <grandmonacoayuda.com>, <grandmonacobingo.com>, <grandmonacobingo.net>, <grandmonacoclub.com>, <grandmonacocraps.com>, <grandmonacogames.com>, <grandmonacogames.net>, <grandmonacogaming.com>, <grandmonacogaming.net>, <grandmonacohost.com>, <grandmonacohosts.com>, <grandmonacolottery.com>, <grandmonacolottery.net>, <grandmonacolotto.com>, <grandmonacolounge.com>, <grandmonacomahjong.com>, <grandmonacomillions.com>, <grandmonacomillions.net>, <grandmonacomillions.org>, <grandmonaconews.com>, <grandmonacoonlinecasino.com>, <grandmonacoonlinegaming.com>, <grandmonacoonlinepoker.com>, <grandmonacopartners.com>, <grandmonacoplayersclub.com>, <grandmonacoplayersclub.net>, <grandmonacopokerclub.com>, <grandmonacopokerclub.net>, <grandmonacopokerclub.org>, <grand-monaco-poker.com>, <grandmonacopoker.com>, <grandmonacopoker.net>, <grandmonacopoker.org>, <grandmonacopromotions.com>, <grandmonacoracebook.com>, <grandmonacoracebook.net>, <grandmonacoracebook.org>, <grandmonacorewards.com>, <grandmonacoskillgames.com>, <grandmonacoskillgames.net>, <grandmonacoslots.com>, <grandmonacosportsbook.com>, <grandmonacosportsbook.net>, <grandmonacosports.com>, <grandmonacosports.net>, <grandmonacostore.com>, <grandmonacosupport.com>, <grandmonacovideopoker.com>, <pokergrandmonaco.net> and <pokergrandmonaco.org>. In no case does the addition of the descriptive term destroy the conceptual similarity between the disputed domain name and the Complainant's mark as described above, regardless of whether the generic term added is related to gambling or not and regardless of whether the descriptive term includes a typographical error as in <grandmonacoayda.com> (instead of "ayuda" which is Spanish and means "help"). As a result, these domain names are confusingly similar to the Complainant's mark CASINO DE MONACO as well.

The Panel wishes to point out that confusing similarity is also given between all of the disputed domain names and the Complainant's well-known mark CASINO DE MONTE-CARLO. As many previous UDRP panels have found, Monte Carlo is commonly associated with the State of Monaco (cf. *Société des Bains de Mer et du Cercle des Étrangers à Monaco v. Empire Online Ltd.*, WIPO Case No. D2006-0289 - <monacogoldcasino.com> with further references). The geographical locations "Monaco" and "Monte-Carlo" are therefore interchangeable if used together with the noun "casino".

It is undisputed that the Complainant's mark CASINO DE MONTE-CARLO is well-known and enjoys a substantial reputation. This is in the view of the Panel regardless of whether the Complainant's exclusive concession for gambling in Monaco ended in April 2007 or not.

As a result, the domain names are confusingly similar to the Complainant's trademark CASINO DE MONACO as well as to the Complainant's trademark CASINO DE MONTE-CARLO under paragraph 4(a)(i) of the Policy.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy sets out three illustrative circumstances as examples which, if established by the respondent, shall demonstrate its rights to or legitimate interests in the domain name for purposes of paragraph 4(a)(ii) of the Policy, i.e.

- (i) before any notice to the respondent of the dispute, the use by the respondent of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a *bona fide* offering of goods or services; or
- (ii) the respondent (as an individual, business or other organization) has been commonly known by the domain name, even if the respondent has acquired no trademark or service mark rights; or
- (iii) the respondent is making a legitimate non-commercial or fair use of the domain name, without intent for commercial gain to misleadingly divert customers or to tarnish the service marks at issue.

As the Respondents wish to rely on paragraph 4(c)(i) of the Policy, the question is whether they used the disputed domain names in connection with a *bona fide* offering of goods or services. It is hard to imagine that they did not know about the Complainant and its activities with a view to the disclaimer on the websites under all of the active disputed domain names and the fact that the Respondent Max Wright explicitly acknowledges the "substantial reputation in the name "Casino de Monte Carlo"" and that such "is the name by which the Complainant's main Casino is known the world over". Even if the Respondents wrongly assumed that the disputed domain names were not confusingly similar to the Complainant's mark CASINO DE MONTE -CARLO, this erroneous legal conclusion would not be sufficient to consider the Respondents' offering of services as being in good faith, as they were well aware of the underlying facts. It is a general legal principle that a mistake or error of law (as opposed to an error of fact) is, at least where it can be avoided, not a justification or an exculpation and therefore irrelevant. The buyer of a domain name must always anticipate the possibility of cyber squatting procedures. Moreover, at the time of the acquisition of the domain names in 2006, the Respondents would have found many decisions against holders of domain names very similar to the disputed domain names had they done any searches. They have therefore not offered their services in good faith.

Whether any of the Respondents' predecessors used (some of) the disputed domain names in good faith at some earlier stage is not relevant here, as the Respondents themselves must have acted *bona fide* and they can only have done so after the acquisition of the disputed domain names. Nor does it make any difference that the Respondents' business will allegedly suffer damages in case the domain names are transferred to the Complainant – the mere fact that the Respondents incurred expenses and have invested a sum of money in the domain names does not confer a legitimate right or interest onto them (cf. *Société des Bains de Mer et du Cercle des Étrangers à Monaco v. Javier Llorens*, WIPO Case No. D2000-1319 - <casinomonaco.net>).

To sum up, the Respondents did not use the domain names in connection with a *bona fide* offering of goods or services under paragraph 4(c)(i) of the Policy.

The Respondents further contend that PlayShare and its predecessors have built up an independent reputation of the name "Grand Monaco", thus referring to paragraph 4(c)(ii) of the Policy. However, this allegation is not supported by any

evidence whatsoever, and the mere allegation is not sufficient to meet the Respondents' burden of proof after the Complainant has established *prima facie* that the Respondents do not enjoy rights to or legitimate interests in the disputed domain names. Therefore, the Respondents cannot rely on paragraph 4(c)(ii) of the Policy either.

As a result, the Respondents cannot claim rights to or legitimate interests in the disputed domain names under paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy sets out four illustrative circumstances, which, though not exclusive, shall be evidence of the registration and use of the domain name in bad faith for purposes of paragraph 4(a)(iii) of the Policy, i.e.

- (i) circumstances indicating that the respondent has registered or acquired the domain name primarily for the purpose of selling, renting or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of the respondent's documented out-of-pocket costs directly related to the domain name; or
- (ii) the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or
- (iii) the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or
- (iv) by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the respondent's website or location or of a product or service on its website or location.

The circumstances mentioned in paragraph 4(b) of the Policy are not exclusive, while the two elements of the third requirement of the Policy are cumulative conditions: the Complainant must show that the domain name was registered in bad faith and is being used in bad faith.

As outlined above, the Respondents (professionals in the gambling business) were well aware of the Complainant's rights in the name and trademark CASINO DE MONTE-CARLO when they registered (acquired) the disputed domain names, which were therefore registered in bad faith.

To the extent that the disputed domain names resolve to an active website (as most of them do), they all lead Internet users to the same site, where visitors can play online casino games by downloading casino software. This type of bad faith use is addressed by paragraph 4(b)(iv) of the Policy - the Respondents intentionally attempt to attract, for commercial gain, Internet users to their website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondents' website. Again, this is regardless of whether the Respondents arrived at the correct legal conclusion regarding confusing similarity between the disputed domain names and the Complainant's mark CASINO DE

MONTE-CARLO: The disputed domain names attract Internet users due to their suggestion of affiliation with the Complainant's well-known mark of which the Respondents have always been aware.

To the extent, however, that the Respondents have not yet constructed websites under the disputed domain names (as is the case for some of them, which are parked "courtesy of GoDaddy.com"), this behavior is to be considered as a case of passive holding, which corresponds to an active use (cf. *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. D2000-0003 - <telstra.org>; *American Home Products Corporation v. Haymont Veterinary Clinic*, WIPO Case No. D2000-0502 - <etogesic.com>; *Jupiters Limited v. Aaron Hall*, WIPO Case No. D2000-0574 - <jupiters-casino.com>; *Teledesic LLC v. McDougal Design*, WIPO Case No. D2000-0620 - <internet-in-the-sky.org> with further references), mainly for two reasons: the strong reputation of the Complainant's CASINO DE MONTE-CARLO mark on the one hand and the fact that it is impossible to conceive a good faith use of such domain names by the Respondents that would not be illegitimate on the other hand.

All disputed domain names are therefore being used in bad faith pursuant to paragraph 4(a)(iii) of the Policy.

As a result, the requirements of paragraph 4(a)(iii) of the Policy have also been fulfilled.

7. Decision

For all the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the domain names

<casinograndmonaco.com>
 <casinograndmonaco.net>
 <casinograndmonaco.org>
 <deutschesgrandmonaco.com>
 <grandmonacoayda.com>
 <grandmonacoayuda.com>
 <grandmonacobingo.com>
 <grandmonacobingo.net>
 <grandmonacocasinoclub.com>
 <grandmonacocasinoclub.net>
 <grandmonacocasinoclub.org>
 <grand-monaco-casino.com>
 <grandmonacocasino.com>
 <grandmonacocasino.net>
 <grandmonacocasino.org>
 <grandmonacoclub.com>
 <grand-monaco.com>
 <grandmonaco.com>
 <grandmonacocraps.com>
 <grandmonacogames.com>
 <grandmonacogames.net>
 <grandmonacogaming.com>
 <grandmonacogaming.net>
 <grandmonacohost.com>

<grandmonacohosts.com>
<grandmonacolottery.com>
<grandmonacolottery.net>
<grandmonacolotto.com>
<grandmonacolounge.com>
<grandmonacomahjong.com>
<grandmonacomillions.com>
<grandmonacomillions.net>
<grandmonacomillions.org>
<grandmonaco.net>
<grandmonaconews.com>
<grandmonacoonlinecasino.com>
<grandmonacoonlinegaming.com>
<grandmonacoonlinepoker.com>
<grandmonaco.org>
<grandmonacopartners.com>
<grandmonacoplayersclub.com>
<grandmonacoplayersclub.net>
<grandmonacopokerclub.com>
<grandmonacopokerclub.net>
<grandmonacopokerclub.org>
<grand-monaco-poker.com>
<grandmonacopoker.com>
<grandmonacopoker.net>
<grandmonacopoker.org>
<grandmonacopromotions.com>
<grandmonacoracebook.com>
<grandmonacoracebook.net>
<grandmonacoracebook.org>
<grandmonacorewards.com>
<grandmonacoskillgames.com>
<grandmonacoskillgames.net>
<grandmonacoslots.com>
<grandmonacosportsbook.com>
<grandmonacosportsbook.net>
<grandmonacosports.com>
<grandmonacosports.net>
<grandmonacostore.com>
<grandmonacosupport.com>
<grandmonacovideopoker.com>
<pokergrandmonaco.net>
<pokergrandmonaco.org>

be transferred to the Complainant.

Brigitte Joppich
Sole Panelist

Dated: May 25, 2007

John C. West - 007233
jwest@jsslaw.com
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201 East Washington Street
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Telephone: (602) 262-5911

Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

Case No. 2:07-cv-01203-PGR

DECLARATION OF MATTHEW JAMES DICK

I, MATTHEW JAMES DICK of 3 Lincoln's Inn Fields, London WC2A 3AA
declare as follows:

1. I am an associate solicitor in the firm of Bristows, a firm of English
solicitors which is acting as agent for Société des Bains de Mer et du Cercle des
Étrangers à Monaco's ("SBM") attorneys, Quinn Emanuel Urquhart Oliver &
Hedges LLP. I am over 18 years of age and am not a party to the action. I submit
this declaration in support of SBM's Motion To Transfer Or, In the Alternative, To
Dismiss. Save where otherwise indicated, the facts and matters set out in this
Declaration are within my knowledge and are true. Where details stated below are
not within my own knowledge, I will state the source of my information and in each

1 case I believe such information to be true.

2 2. Under the supervision of Brian Cordery, a partner of Bristows, I have
3 been involved in the attempted service of pleadings filed by SBM in the District
4 Court of the Southern District of New York (the "New York Action") upon the
5 Plaintiffs named herein. The affidavit of my colleague, Ellen Georgina Hughes-
6 Jones, sworn on 15 June 2007 and already filed with the Court in relation to the New
7 York Action, confirms service of that proceeding on Plaintiffs Playshare plc and
8 Lucan Toh.

9 3. On June 12, 2007, pleadings filed by SBM in connection with the New
10 York Action were sent to Maxwell Wright by first class post to his last known
11 residential address according to the details for directors held by Companies House
12 (namely, 25 Brockhill Road, Hythe, Kent CT21 4AE). A copy of this extract is
13 exhibited hereto as "MJD-1". A letter of service from Bristows was sent to
14 accompany the Proceedings. A copy of this letter is exhibited hereto as "MJD-2".
15 Service by first class post on individuals is a valid method of service according to the
16 Civil Procedure Rules ("CPR") which govern civil litigation in England and Wales. I
17 exhibit as "MJD-3" a copy of an extract from the CPR (2007) Part 6, which sets out
18 the relevant rule.

19 4. On 14 June 2007, SBM's pleadings as sent to Maxwell Wright were
20 returned to Bristows marked "Return to Sender" with a note that the addressee
21 (Maxwell Wright) had moved away. The address recorded for Maxwell Wright at
22 Companies House therefore appears to be incorrect. Notwithstanding his duty to
23 inform Companies House within 14 days of any change of his address, Mr. Wright
24 has not done so.

25 5. On the same day (14 June 2007) I spoke on the telephone with Mr.
26 Warner Jerrard, a Solicitor working at the London law firm Hamilton Downing

1 Quinn. Mr. Jerrard represented Maxwell Wright in the proceedings commenced by
2 SBM on 21 March 2007 before the World Intellectual Property Organization
3 (“WIPO”) pursuant to the Uniform Domain Name Dispute Resolution Policy, as
4 referred to at paragraph 47 of the Amended Complaint to the New York Action. Mr.
5 Jerrard is also currently representing Maxwell Wright (and Lucan Toh and Playshare
6 plc) in proceedings commenced against Mr. Wright in the UK by SBM on the
7 grounds of trade mark infringement and passing off (“the UK Proceedings”). I
8 exhibit as “MJD-4” a copy of a letter dated 13 June 2007 from Messrs. Hamilton
9 Downing Quinn to Bristows confirming that Hamilton Downing Quinn accepted
10 service of the UK Proceedings on behalf of Maxwell Wright. Mr. Jerrard’s reference
11 (“WJ.GA71-2”) can be seen towards the top of this letter.

12 6. I asked Mr. Jerrard to confirm, in the absence of an accurate address for
13 Maxwell Wright held at Companies House, whether he was authorised to accept
14 service of the New York Action on behalf of Mr. Wright, given that he had accepted
15 service of the UK Proceedings on his behalf. Mr. Jerrard said that he was not so
16 authorised. I then asked if Mr. Jerrard would provide me with an alternative address
17 for service for Mr. Wright. Mr. Jerrard refused to do so.

18 7. On 15 June 2007 I sent a letter to Mr. Jerrard asking him to reconsider
19 his position. I also notified Mr. Jerrard of our intention to apply to the English Court
20 for an Order compelling him to accept service of the New York Action on behalf of
21 Mr. Wright unless he agreed to accept service voluntarily on his behalf. I exhibit as
22 “MJD-5” a copy of this letter.

23 8. In the absence of a satisfactory response from Mr. Jerrard, on 20 June
24 2007 I appeared before a Master of the Supreme Court of England and Wales (Master
25 Moncaster) to make an application for an Order that Mr. Jerrard be compelled to
26 accept service of the New York Action on behalf of Maxwell Wright. I exhibit as

1 “MJD-6” a copy of the Application Notice and draft Order in relation to this hearing.

2 9. Although he agreed that Mr. Jerrard was being ‘unhelpful’ in his
3 refusal to accept service on behalf of Mr. Wright (or to provide an alternative address
4 for service for Mr. Wright), Master Moncaster felt unable to grant the Order sought
5 for lack of jurisdiction.

6 10. On 22 June 2007 I instructed a UK enquiry agent, Mr. Tim Dabin of
7 Priaulx Associates, to undertake searches of the electoral roll, credit databases and
8 other lawful investigations in an effort to trace Mr. Wright’s current address. Mr.
9 Dabin located an alternative residential address at 25A Dempster Road, London
10 SW18 1AS, where Mr. Wright had resided fairly recently. On my instructions, Mr.
11 Dabin visited this address and made enquiries regarding Maxwell Wright at
12 neighbouring properties. None of the residents with whom he spoke had any
13 knowledge of Maxwell Wright.

14 11. It should be noted that on 6 June 2007 the UK Proceedings were sent
15 by first class post to the address held for Mr. Wright at UK Companies House
16 (namely, 25 Brockhill Road, Hythe, Kent CT21 4AE). This is the same address to
17 which the New York Action pleadings were sent on 12 June 2007. The UK
18 Proceedings were not returned to us, and we were not informed that Mr. Wright had
19 moved from that address at the time. As stated at paragraph 5 above, Warner Jerrard
20 has accepted service of the UK Proceedings on behalf of Mr. Wright.

21 12. According to the UK Land Registry, the property at 25 Brockhill Road,
22 Hythe, Kent CT21 4AE is owned by a George Walter Edward Wright. I exhibit as
23 “MJD-7” a copy from the Land Registry Proprietorship Register dated 29 June 2007
24 confirming this. I exhibit as “MJD-8” copies from the UK Companies House register
25 dated 13 July 2007 showing that both George Walter Edward Wright and Elizabeth
26 Ann Wright are registered as directors of a company unconnected with either the UK

1 Proceedings or New York Action, and have given their addresses as 25 Brockhill
2 Road, Saltwood, Hythe, Kent CT21 4AE. The dates of birth for George Wright and
3 Elizabeth Wright are given, respectively, as 27 June 1944 and 18 June 1944. It
4 seems likely that these individuals are related to Maxwell Wright (and are, quite
5 possibly, his parents). Given that the UK Proceedings were not returned from this
6 address when sent there on 12 June 2007, I infer that George and Elizabeth Wright
7 normally accept posted mail on behalf of Maxwell Wright (although he no longer
8 appears to reside at this address). I also infer that following service of the UK
9 Proceedings at this address, George and Elizabeth Wright have been instructed by
10 Maxwell Wright not to accept any further documents received by them and addressed
11 for his attention (and to return any such documents to the sender) in an attempt to
12 evade service of the New York Action on him.

13 13. Despite the various attempts outlined above, a valid residential address
14 for Maxwell Wright could not be found and valid service of the New York Action
15 could not be effected on him. Nevertheless, given the above information it seems
16 highly unlikely that Mr. Wright could deny knowledge of the New York Action
17 against him. As referred to in paragraph 2 above, the New York Action pleadings
18 were deemed validly served on Playshare plc on 13 June 2007. Maxwell Wright is a
19 director of Playshare plc and also the Chief Executive Officer of this company. He is
20 likely to have been advised of the service of the New York Action on Playshare plc,
21 and those documents make clear that he himself is also listed as a defendant.
22 Furthermore, Warner Jerrard (who is the attorney representing Mr. Wright in the UK
23 Proceedings and therefore likely to be in regular contact with him) was also made
24 aware of the New York Action against his client as indicated in paragraphs 6 and 7
25 above.

26 14. On 25 June 2007 I wrote a further letter to Warner Jerrard, Mr.

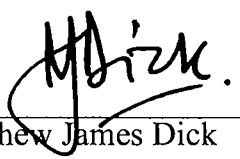
1 Wright's UK attorney, informing him that his client's ongoing refusal to provide us
2 with a valid address for service of the New York Action was causing much
3 unnecessary work in trying to locate him. I exhibit as "MJD-9" a copy of this letter.

4 15. Despite such ongoing communication with Mr. Wright's UK attorney
5 since 14 June 2007, I am advised by SBM's attorneys, Quinn Emanuel Urquhart
6 Oliver & Hedges LLP that the New York Action Defendants' US attorneys White &
7 Case LLP confirmed only on 2 July 2007 that they were representing all Defendants
8 in the New York Action and would accept service on their clients' behalf, including
9 Mr. Wright.

10 16. In the circumstances, the Plaintiffs were undoubtedly aware from at
11 least 13 June 2007 (when the New York Action pleadings were served on Playshare
12 plc) of the existence of the proceeding filed in the Southern District Court of New
13 York on 6 June 2007. This is some time before the Plaintiffs issued proceedings in
14 the District Court of Arizona that I am advised by SBM's attorneys were filed on 19
15 June 2007.

16
17 I declare under penalty of perjury under the laws of the United States of
18 America that the foregoing is true and correct.

19
20
21 DATED this 13th day of July 2007.

22
23 
24 Matthew James Dick
25
26

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-1"

This is the exhibit marked "MJD-1" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

COMPANY APPOINTMENTS

Registered No.: 05863469
Name: PLAYSHARE PLC
Address: 7 QUEEN STREET
LONDON
W1J 5PB

Company Appointments: 5 / Resignations: 4

Exclude Resignations

To view details of other appointments held, click on the appropriate underlined name.

MORSE, CHRISTOPHER CHARLES

THE ELMS
MARSHSIDE
CANTERBURY
KENT
CT3 4EE

Date of Birth: 01/11/1950

Company Appointments: 152

SECRETARY

Appointed: 30/06/2006

Nationality: BRITISH

PATERSON BROWN, TIMOTHY

33 ASHLEY GARDENS
AMBROSDEN AVENUE
LONDON
SW1P 1QE

Date of Birth: 27/09/1960

Company Appointments: 14

DIRECTOR

Appointed: 18/08/2006

Nationality: BRITISH

SANDYS, RODERICK JULIAN FREDERICK

48 TACHBROOK STREET
LONDON
SW1V 2NA

Date of Birth: 15/09/1977

Company Appointments: 9

DIRECTOR

Appointed: 30/06/2006

Nationality: BRITISH

SMEDLEY, STEPHEN

NO 1 THE MEADOWS
ALCAIDESA
CADIZ
11300
SPAIN
FOREIGN

Date of Birth: 28/01/1975

Company Appointments: 1

DIRECTOR

Appointed: 30/01/2007

Nationality: BRITISH

WRIGHT, MAXWELL GEORGE

25 BROCKHILL ROAD
HYTHE
KENT

DIRECTOR

Appointed: 02/10/2006

Nationality: BRITISH

CT21 4AE

Date of Birth: 21/03/1979

Company Appointments: 8

SWIFT INCORPORATIONS LIMITED

1 MITCHELL LANE

BRISTOL

BS1 6BU

SECRETARY

Appointed: 30/06/2006

Resigned: 30/06/2006

Nationality: BRITISH

Company Appointments: more than 1000

Click [HERE](#) for a full count of this persons appointments.

FORSYTH, ROBERT PAUL EDWARD

344 GARDINERS ROAD,

HAREWOOD

CHRISTCHURCH

NEW ZEALAND

Date of Birth: 23/01/1980

Company Appointments: 1

DIRECTOR

Appointed: 19/07/2006

Resigned: 30/01/2007

Nationality: NEW ZEALAND

FORSYTH, STEPHEN ANDREW

PO BOX 42127

ABU DHABI

UNITED ARAB EMIRATES

FOREIGN

Date of Birth: 26/05/1950

Company Appointments: 17

DIRECTOR

Appointed: 18/08/2006

Resigned: 16/11/2006

Nationality: BRITISH

TOH, LUCAN MICHAEL

FLAT 32

64 BUCKINGHAM GATE

LONDON

SW1E 6AR

Date of Birth: 14/02/1980

Company Appointments: 3

DIRECTOR

Appointed: 30/06/2006

Resigned: 20/11/2006

Nationality: IRISH

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-2"

This is the exhibit marked "MJD-2" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

3 Lincoln's Inn Fields
London WC2A 3AA

telephone
+44 (0)20 7400 8000

facsimile
+44 (0)20 7400 8050

email
info@bristows.com

website
www.bristows.com

DX269 London
(Chancery Lane)

Our ref: 404/BDC/10124 0001

Your ref:

12 June 2007

BRISTOWS

Maxwell Wright
25 Brockhill Road
Hythe
Kent CT21 4AE

BY FIRST CLASS POST

Dear Sir

**Société des Bains de Mer et du Cercle des Étrangers à Monaco v (1)
PlayShare PLC (2) Grand Monaco Ltd, (3) GamShare (UK) Ltd, (4) Lucan
Toh, (5) Maxwell Wright and (6) Hilstead Ltd
United States District Court, Southern District of New York
Case No. 07 Civ 4802**

We are English solicitors acting as agents for Quinn Emanuel of 51 Madison Avenue, 22nd Floor, New York, 10010.

We enclose, by way of service, the following documents:

1. Civil Cover Sheet;
2. Complaint filed against you by the above Plaintiff;
3. Summons dated 6 June 2007;
4. Plaintiff's Disclosures pursuant to Rule 7.1;
5. Individual Practices of Judge Deborah A. Batts and Magistrate Judge Ronald L. Ellis;
6. Amended Complaint;
7. Amended Summons dated 7 June 2007; and
8. Letter to Judge Deborah A. Batts dated 7 June 2007.

You will note that your address contained in the proceedings detailed above is the address as set out in the Response to ICANN Complaint D2007-0249 by the Respondents dated 27 April 2007. We are, however, sending this letter and

enclosures to your residential address as obtained from the most recent UK Companies House records.

Yours faithfully

Bristows

Bristows

Encs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-3"

This is the exhibit marked "MJD-3" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

<u>Service out of the jurisdiction where the permission of the court is not required</u>	Rule 6.19
<u>Service out of the jurisdiction where the permission of the court is required</u>	Rule 6.20
<u>Application for permission to serve claim form out of jurisdiction</u>	Rule 6.21
<u>Period for acknowledging service or admitting the claim where the claim form is served out of the jurisdiction under rule 6.19</u>	Rule 6.22
<u>Period for filing a defence where the claim form is served out of the jurisdiction under rule 6.19</u>	Rule 6.23
<u>Method of service – general provisions</u>	Rule 6.24
<u>Service through foreign governments, judicial authorities and British Consular authorities</u>	Rule 6.25
<u>Procedure where service is to be through foreign governments, judicial authorities and British Consular authorities</u>	Rule 6.26
<u>Service in accordance with the Service Regulation</u>	Rule 6.26A
<u>Service of claim form on State where court permits service out of the jurisdiction</u>	Rule 6.27
<u>Translation of claim form</u>	Rule 6.28
<u>Undertaking to be responsible for expenses of the Foreign and Commonwealth Office</u>	Rule 6.29
<u>Service of documents other than the claim form</u>	Rule 6.30
<u>Proof of service</u>	Rule 6.31
 <u>IV SERVICE OF FOREIGN PROCESS</u>	
<u>Scope and definitions</u>	Rule 6.32
<u>Request for service</u>	Rule 6.33
<u>Method of service</u>	Rule 6.34
<u>After service</u>	Rule 6.35


I GENERAL RULES ABOUT SERVICE

Part 6 rules about service apply generally


- 6.1 The rules in this Part apply to the service of documents, except where –
- (a) any other enactment, a rule in another Part, or a practice direction makes a different provision; or
 - (b) the court orders otherwise.
- (For service in possession claims, see Part 55).

Methods of service – general


6.2 (1) A document may be served by any of the following methods –

- (a) personal service, in accordance with rule 6.4;
-  (b) first class post (or an alternative service which provides for delivery on the next working day);
- (c) leaving the document at a place specified in rule 6.5;
- (d) through a document exchange in accordance with the relevant practice direction; or
- (e) by fax or other means of electronic communication in accordance with the relevant practice direction.

(Rule 6.8 provides for the court to permit service by an alternative method)

- (2) A company may be served by any method permitted under this Part as an alternative to the methods of service set out in –
- (a) section 725 of the Companies Act 1985⁽¹⁾ (service by leaving a document at or posting it to an authorised place);
 - (b) section 695 of that Act (service on overseas companies); and
 - (c) section 694A of that Act (service of documents on companies incorporated outside the UK and Gibraltar and having a branch in Great Britain).
- 

Who is to serve

- 6.3 (1) The court will serve a document which it has issued or prepared except where –
- (a) a rule provides that a party must serve the document in question;
 - (b) the party on whose behalf the document is to be served notifies the court that he wishes to serve it himself;
 - (c) a practice direction provides otherwise;
 - (d) the court orders otherwise; or
 - (e) the court has failed to serve and has sent a notice of non-service to the party on whose behalf the document is to be served in accordance with rule 6.11.
- (2) Where the court is to serve a document, it is for the court to decide which of the methods of service specified in rule 6.2 is to be used.
- (3) Where a party prepares a document which is to be served by the court, that party must file a copy for the court, and for each party to be served.
- 

Personal service

6.4 (1) A document to be served may be served personally, except as provided in paragraphs (2) and (2A).

(2) Where a solicitor –

(a) is authorised to accept service on behalf of a party; and

(b) has notified the party serving the document in writing that he is so authorised,

a document must be served on the solicitor, unless personal service is required by an enactment, rule, practice direction or court order.

(2A) In civil proceedings by or against the Crown, as defined in rule 66.1(2), documents required to be served on the Crown may not be served personally.

(3) A document is served personally on an individual by leaving it with that individual.

(4) A document is served personally on a company or other corporation by leaving it with a person holding a senior position within the company or corporation.

(The service practice direction sets out the meaning of 'senior position')

(5) A document is served personally on a partnership where partners are being sued in the name of their firm by leaving it with –

(a) a partner; or

(b) a person who, at the time of service, has the control or management of the partnership business at its principal place of business.

Address for service

6.5 (1) Except as provided by Section III of this Part (service out of the jurisdiction) a document must be served within the jurisdiction.

('Jurisdiction' is defined in rule 2.3)

(2) A party must give an address for service within the jurisdiction. Such address must include a full postcode, unless the court orders otherwise.

(Paragraph 2.4 of the Practice Direction to Part 16 contains provision about the content of an address for service).

(3) Where a party –

(a) does not give the business address of his solicitor as his address for service; and

(b) resides or carries on business within the jurisdiction,

he must give his residence or place of business as his address for service.

(4) Any document to be served –

- (a) by first class post (or an alternative service which provides for delivery on the next working day);
- (b) by leaving it at the place of service;
- (c) through a document exchange; or
- (d) by fax or by other means of electronic communication,

must be sent or transmitted to, or left at, the address for service given by the party to be served.

(5) Where –

- (a) a solicitor is acting for the party to be served; and
- (b) the document to be served is not the claim form;

the party's address for service is the business address of his solicitor.

(Rule 6.13 specifies when the business address of a defendant's solicitor may be the defendant's address for service in relation to the claim form)

(6) Where –

- (a) no solicitor is acting for the party to be served; and
- (b) the party has not given an address for service,

the document must be sent or transmitted to, or left at, the place shown in the following table.

(Rule 6.2(2) sets out the statutory methods of service on a company)



<i>Nature of party to be served</i>	<i>Place of service</i>
Individual	<ul style="list-style-type: none"> • Usual or last known residence.
Proprietor of a business	<ul style="list-style-type: none"> • Usual or last known residence; or • Place of business or last known place of business.
Individual who is suing or being sued in the name of a firm	<ul style="list-style-type: none"> • Usual or last known residence; or • Principal or last known place of business of the firm.
Corporation incorporated in England and Wales other than a company	<ul style="list-style-type: none"> • Principal office of the corporation; or • Any place within the jurisdiction where the corporation carries on its

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-4"

This is the exhibit marked "MJD-4" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

HAMILTON DOWNING QUINN

—SOLICITORS—

WALTON EDDLESTONE MA
PHILIP HAMILTON
CHARLES ILIFF MA
JAMES DAVIS LLB

RUSKIN HOUSE
40/41 MUSEUM STREET
LONDON WC1A 1LT
TEL: +44 (0)20-7831 8939
FAX: +44 (0)20-7831 8798
DX: 35717 BLOOMSBURY
E-MAIL: law@hamd.co.uk
www.hamiltondowning.com

Bristows
DX 269 LONDON (CHANCERY LANE)

Rec'd
14/6/7

Our ref: WJ.GA71-2 Your Ref: 404/BDC/101240001

13 June 2007

Dear Sirs

**Re: La Société des Bains de Mer et du Cercle des Étrangers à Monaco –v- Playshare Plc and
Lucan Michael Toh and Maxwell George Wright – High Court proceedings HC07CO1489**

Thank you for your letter of 6 June.

Please note that we have served Acknowledgements of Service on behalf of all three Defendants.

Yours faithfully

HAMILTON DOWNING QUINN

ASSOCIATE: ALAN D TAYLOR

CONSULTANTS: ANTHONY B QUINN MICHAEL SHONE MA WARNER L JERRARD
INCORPORATING JERRARD SAUNDERS DONN ARNOLD TICKNER & CO
Singapore Representative Office: 83 Clemenceau Avenue, #13-02 UE Square, Singapore 239920
Tel: 65-6238 3508 Fax: 65-6887 3508
Regulated by the Law Society

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-5"

This is the exhibit marked "MJD-5" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

3 Lincoln's Inn Fields

London WC2A 3AA

telephone

+44 (0)20 7400 8000

facsimile

+44 (0)20 7400 8050

email

info@bristows.com

website

www.bristows.com

DX269 London

(Chancery Lane)

Our ref: 404/BDC/10124 0001

Your ref: WJ.GA71-2

15 June 2007

BRISTOWS

Hamilton Downing Quinn

DX 35717 Bloomsbury

By fax: 020 7831 8798

Confirmation by DX

URGENT: RESPONSE REQUIRED BY
NOON ON MONDAY 18 JUNE 2007

Dear Sirs

La Société des Bains de Mer et du Cercle des Étrangers à Monaco v Playshare plc & Lucan Michael Toh & Maxwell George Wright (Case No. HC07 CO1489)

Related proceedings in the United States District Court, Southern District of New York (Case No. 07 Civ 4802) involving Mr Maxwell Wright

We refer to the telephone conversation of 14 June 2007 between Warner Jerrard of your office and Matthew Dick of this office relating to service of US proceedings that have been commenced against, among others, your client Mr Maxwell Wright.

The address for Mr Wright listed with Companies House is incorrect. Documents relating to the US proceedings that were sent to that address have been returned to us with a note that Mr Wright no longer resides there. As you will know, Mr Wright is under an obligation to notify Companies House within 14 days of his change of address.

We note from your letter of 13 June 2007 that you have filed Acknowledgements of Service on behalf of all three Defendants in the above action before the UK Court. We also note that you represented all three Defendants in the related ICANN proceedings (Case No. D2007-0249) and, indeed, are likely to have corresponded directly with the Third Defendant, Mr Maxwell Wright, regarding the preparation of his witness statement filed in those latter proceedings.

In the circumstances, we believe that your refusal to accept service of related proceedings that have been commenced in the US against Mr Wright in relation to similar subject matter is unreasonable, and ask you to reconsider your position.

If you still refuse to accept service on behalf of Mr Wright, we will apply to the Court for an order to that effect under Part 6.8 of the Civil Procedure Rules 1998 (as amended). We consider that it is entirely unreasonable for you to refuse to accept service of the US proceedings on behalf of Mr Wright in all the circumstances, and we will draw the Court's attention to this fact, referring to the above telephone conversation and this letter, and seeking full costs of the application from you.

We look forward to hearing from you by 12 noon on Monday 18 June 2007. If we do not hear from you by this time, we have instructions to apply to the Court for the above order without further notice.

Yours faithfully

A handwritten signature in black ink, appearing to read "Bristows".

Bristows

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-6"

This is the exhibit marked "MJD-6" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

You should provide this information for listing the application

1. How do you wish to have your application dealt with
- a) at a hearing? ☒ X
- b) at a telephone conference? ☐
- c) without a hearing? ☐ *complete Qs 5 and 6 below*
2. Give a time estimate for the hearing/conference 15 minutes
3. Is this agreed by all parties? ☐ Yes ☒ No
4. Give dates of any trial period or fixed trial date:
5. Level of judge: Master
6. Party to be served: Playshare plc, Lucan Michael Toh and Maxwell George Wright

**In the HIGH COURT OF JUSTICE
Chancery Division
Intellectual Property****Claim no.** HC 07 C01489**Warrant no.**
(if applicable)**Claimant** La Société des Bains de Mer et du Cercle
des Étrangers à Monaco
(404/BDC/10124 0001)**Defendant** (1) Playshare plc
(2) Lucan Michael Toh
(3) Maxwell George Wright**Date** 19 June 2007

Note You must complete Parts A and B, and Part C if applicable. Send any relevant fee and the completed application to the court with any draft order, witness statement or other evidence; and sufficient copies for service on each respondent.

Part A

1. Enter your full name, or name of solicitor

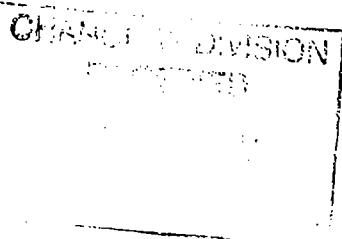
2. State clearly what order you are seeking and if possible attach a draft

3. Briefly set out why you are seeking the order. Include the material facts on which you rely, identifying any rule or statutory provision

I (We)⁽¹⁾ BRISTOWS on behalf of the Claimant

intend to apply for an Order (a draft of which is attached) that⁽²⁾ the solicitor representing the Defendants in these proceedings be compelled to accept on behalf of the Third Defendant service of documents relating to Court proceedings that have been commenced against the Third Defendant (amongst others) in the United States relating to similar subject matter because⁽³⁾

the residential address of the Third Defendant listed in the Register of Directors at Companies House is incorrect. Documents sent by first class post to that address have been returned to Bristows with a note that the Third Defendant no longer resides there. The solicitor representing the Defendants in these proceedings has refused to accept service of the US proceedings on behalf of his client, and would not provide an alternative address for service for the Third Defendant.

**Part B**

I (We) wish to rely on: tick one box

☒ the attached witness statement

☐ my statement of case

☒ evidence in Part C overleaf in support of my application

4. If you are not already a party to the proceedings, you must provide an address for service of documents

Signed

(Applicant)'s Solicitors)'s ~~Litigation friend~~

Position or office held

(if signing on behalf of firm or company)

SOLICITOR

Address to which documents about this claim should be sent (including reference if appropriate)⁽⁴⁾

Bristows		If applicable	
3 Lincoln's Inn Fields, London		Fax No:	020 7400 8050
Reference: 404/BDC/10124 0001		DX no.	269 London (Chancery Lane)
Tel No: 020 7400 8000 Postcode WC2A 3AA		E-Mail:	

The court office at

N244 Application Notice (4.00)

IPTO N244 I

Part C

Claim No. **HC07 C01489**

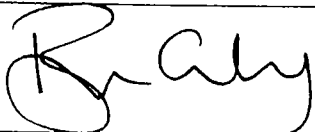
I(We) wish to rely on the following evidence in support of this application:

The enclosed draft Order.

Statement of Truth

^{*}(I believe)(^{*}~~The applicants believe~~) that the facts stated in this application are true
^{*}~~delete as appropriate~~

Signed



(Applicant)(s' Solicitors)(s' Litigation friend)

**Position or
office held**

(if signing on behalf of
firm or company)

SOLICITOR

Date

19 June 2007

**IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
INTELLECTUAL PROPERTY**

Claim No HC07 C01489

Master Moncaster

BETWEEN:

**LA SOCIÉTÉ DES BAINS DE MER ET
DU CERCLE DES ÉTRANGERS À MONACO
(a company incorporated under the laws
of the Principality of Monaco)**

Claimant

and

**(1) PLAYSHARE PLC
(2) LUCAN MICHAEL TOH
(3) MAXWELL GEORGE WRIGHT**

Defendants

***Draft*/ORDER FOR SERVICE BY AN
ALTERNATIVE METHOD**

UPON the application of the Claimant

AND UPON hearing the Advocate for the Claimant

AND UPON reading the documents marked in the Court file as having been read:

IT IS ORDERED THAT:

1. The Defendants' solicitor, Mr Warner Jerrard of Messrs. Hamilton Downing Quinn, Ruskin House, Museum Street, London WC1A 1LT does accept service on behalf of the Third Defendant of documents relating to proceedings commenced against (amongst others) the Third Defendant in the United States District Court, Southern District of New York under Case No. 07 Civ 4802 ("the US Documents").
2. The US Documents be served on Mr Warner Jerrard by delivering them by hand and leaving them at the address of his office, namely Messrs. Hamilton Downing Quinn, Ruskin House, Museum Street, London WC1A 1LT on Wednesday 20 June 2007.
3. The deemed date of service of the US Documents is therefore Thursday 21 June 2007.
4. The Costs of this application in the sum of £500 be paid by the Defendants.

BRISTOWS

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION
INTELLECTUAL PROPERTY

Claim No HC07 C01489

Master Moncaster

BETWEEN:

LA SOCIÉTÉ DES BAINS DE MER ET
DU CERCLE DES ÉTRANGERS À MONACO
(a company incorporated under the laws
of the Principality of Monaco)
Claimant

-and-

(1) PLAYSHARE PLC
(2) LUCAN MICHAEL TOH
(3) MAXWELL GEORGE WRIGHT
Defendants

*Draft/*ORDER FOR SERVICE BY AN
ALTERNATIVE METHOD

Bristows
3 Lincoln's Inn Fields
London
WC2A 3AA

Tel: 020 7400 8000
Fax: 020 7400 8050
Ref: 404/BDC/10124 0001

Solicitors for the Claimant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-7"

This is the exhibit marked "MJD-7" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007.

Land Registry Direct: Register View**Date: 29 JUN 2007**

THIS IS A PRINT OF THE VIEW OF THE REGISTER OBTAINED THROUGH LAND REGISTRY DIRECT SHOWING THE ENTRIES SUBSISTING IN THE REGISTER ON 29 JUN 2007 AT 10:46:59. THE ENTRIES SHOWN DO NOT TAKE ACCOUNT OF ANY APPLICATIONS PENDING IN THE REGISTRY. FOR SEARCH PURPOSES, THE ABOVE DATE SHOULD BE USED AS THE SEARCH FROM DATE.

THIS TITLE IS DEALT WITH BY TUNBRIDGE WELLS DISTRICT LAND REGISTRY.

TITLE NO: K824811

REGISTER LAST UPDATED ON : 14 APR 2003 AT 12:45:58

A: Property Register

This register describes the land and estate comprised in the title.

KENT : SHEPWAY

1. (28.09.1931) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being 25 Brockhill Road, Hythe, (CT21 4AE).

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title Absolute

1. (14.01.1980) PROPRIETOR: %GEORGE WALTER EDWARD WRIGHT% of Eastcote, 25 Brockhill Road, Hythe, *Kent* CT21 4AE.

C: Charges Register

This register contains any charges and other matters that affect the land.

1. The land is subject to the covenant and such of the stipulations as are restrictive and run therewith and are now subsisting and capable of taking effect contained in a Conveyance on Sale of the land dated the 28th of November 1925 and made between The Sandling Saltwood and Hythe Estate Company Limited (therein called the Company) of the one part and Charles Edward Sprinks (therein called the Purchaser) of the other part A copy of the covenant and stipulations is set out below:-

"The Purchaser for himself his heirs executors administrators and assigns hereby covenants with the Company its successors and assigns owner and owners of the said Estate that he the Purchaser his heirs executors administrators and assigns owner and owners of the hereditaments hereby conveyed will at all times hereafter perform and observe the stipulations specified in the first schedule hereto but so that the Purchaser his heirs executors administrators and assigns respectively shall not be liable for any damages for any breach of this covenant after he or they shall have ceased to have any interest in the hereditaments hereby conveyed.

THE FIRST SCHEDULE
Stipulations.

1. THE Purchaser is forthwith to make and afterwards to maintain the boundary fences next the roads and on the side of his lot marked "T" within the boundary.
2. THE building line is defined on the said plan and no building is to project beyond such line save that open porticoes or porches one storey in height may project three feet and bay windows two feet six inches beyond the building line.
3. THE trade of an Innkeeper Licensed Victualler or Retailer of Wines Spirits or Beer shall not be carried on upon any part of the land.
4. NO building shall be erected or used as a shop workshop or factory and no trade business or manufacture shall be carried on upon any part of the land nor shall operative machinery be placed thereon nor any hut caravan house on wheels or other chattel adapted or to be used for a dwelling or sleeping apartment.
5. NOT more than one house shall be built on the land and such house shall be constructed in a substantial manner and shall be of not less value than One thousand pounds exclusive of land fences and stables and all plans and elevations of buildings and of any alterations and additions thereto shall be submitted to and approved by the Company."

NOTE:-Besides the boundary fence next the road, the South West side is marked T within the boundary. The building line is shown on the filed plan.

2. (14.04.2003) REGISTERED CHARGE dated 9 April 2003 to secure the moneys including the further advances therein mentioned.

NOTE: The proprietor of this charge is obliged to make further advances in accordance with the mortgage terms and conditions.

3. (14.04.2003) Proprietor: >NATIONWIDE BUILDING SOCIETY> of Nationwide House, Pipers Way, Swindon L SN38 1NW.
4. (14.04.2003) The Charge Certificate relating to the charge dated 9 April 2003 in favour of Nationwide Building Society is retained in HM Land Registry (Section 63 of the Land Registration Act 1925).

END OF REGISTER

NOTE 1: The date at the beginning of an entry is the date on which the entry was made in the Register.

NOTE 2: Symbols included in register entries do not form part of the register and are used by Land Registry for internal purposes only.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-8"

This is the exhibit marked "MJD-8" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

COMPANY APPOINTMENTS

Registered No.: 04032548
Name: G.W. & E. WRIGHT LIMITED

Address: STOURSIDE PLACE
35-41 STATION ROAD
ASHFORD
KENT TN23 1PP

Company Appointments: 5 / Resignations: 2

Exclude Resignations

To view details of other appointments held, click on the appropriate underlined name.

SMITH, JANE
THE CEDARS
MILL ROAD ALDINGTON
ASHFORD
KENT
TN25 7AJ
Date of Birth: 09/04/1950
Company Appointments: 1

SECRETARY
Appointed: 25/10/2000
Nationality: BRITISH

FAGG, PHILIP
16 ALEXANDRA CORNICHE
SANDGATE
HYTHE
KENT
CT21 5RN
Date of Birth: 16/03/1956
Company Appointments: 1

DIRECTOR
Appointed: 06/10/2000
Nationality: BRITISH

MACDONALD, JOHN
4 CHURCHILL ROAD
CANTERBURY
KENT
CT1 3EB
Date of Birth: 21/09/1958
Company Appointments: 1

DIRECTOR
Appointed: 06/10/2000
Nationality: BRITISH

 WRIGHT, ELIZABETH ANN
25 BROCKHILL ROAD
SALTWOOD
HYTHE
KENT
CT21 4AE
Date of Birth: 18/06/1944
Company Appointments: 2

DIRECTOR
Appointed: 06/10/2000
Nationality: BRITISH

 WRIGHT, GEORGE WALTER EDWARD
25 BROCKHILL ROAD

DIRECTOR
Appointed: 12/07/2000

SALTWOOD

HYTHE

KENT

CT21 4AE

Date of Birth: 27/06/1944

Company Appointments: 2

Nationality: BRITISH

SWIFT INCORPORATIONS LIMITED

1 MITCHELL LANE

BRISTOL

BS1 6BU

NOMINEE SECRETARY

Appointed: 12/07/2000

Resigned: 12/07/2000

Nationality: BRITISH

Company Appointments: 0

WRIGHT, ELIZABETH ANN

25 BROCKHILL ROAD

SALTWOOD

HYTHE

KENT

CT21 4AE

Date of Birth: 18/06/1944

Company Appointments: 2

SECRETARY

Appointed: 12/07/2000

Resigned: 25/10/2000

Nationality: BRITISH

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

PLAYSHARE PLC, LUCAN TOH,
MAX WRIGHT,

Case No. 2:07- cv-01203 (PGR)

Plaintiffs,

vs.

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A
MONACO,

Defendant.

EXHIBIT "MJD-9"

This is the exhibit marked "MJD-9" referred to in the Declaration of MATTHEW JAMES DICK declared this 13th day of July 2007

3 Lincoln's Inn Fields
London WC2A 3AAemail
info@bristows.comtelephone
+44 (0)20 7400 8000website
www.bristows.comfacsimile
+44 (0)20 7400 8050DX269 London
(Chancery Lane)

Our ref: 404/BDC/10124 0001

Your ref: WJ.GA71-2

25 June 2007

BRISTOWS

Hamilton Downing Quinn

DX 35717 Bloomsbury

By fax: 020 7831 8798

Confirmation by DX (with enclosures)

Dear Sirs

**La Société des Bains de Mer et du Cercle des Étrangers à Monaco v
Playshare plc & Lucan Michael Toh & Maxwell George Wright (Case No.
HC07 CO1489)**

**Related proceedings in the United States District Court, Southern District of
New York (Case No. 07 Civ 4802) involving Mr Maxwell Wright & Others**

We refer to our letter of 15 June 2007 and enclose, by way of service, a copy of the application notice dated 19 June 2007 (together with draft Order) and the Order of Master Moncaster dated 20 June 2007, dismissing the application. As you will recall, this was an application under CPR r6.8 for an Order requesting that you accept service of the above US proceedings on behalf of your client Maxwell Wright. Although the Master agreed with our position, he felt unable to grant the Order sought for lack of jurisdiction.

As you are aware, the address for Maxwell Wright as listed at Companies House is incorrect. Given your inability to accept service of the US proceedings on behalf of Mr Wright, and your refusal to provide an alternative address for service for him, we are currently employing other means to obtain his current address details.

We should be grateful if you would seek instructions from Mr Wright as to whether he is willing to provide us with an alternative address for service of the US proceedings against him. His ongoing refusal to assist in this matter is resulting in further costs (both disbursements and legal fees), the full amount of which will be sought against him in the US proceedings detailed above.

We also enclose, for information purposes only, copies of certificates dated 22 June 2007 issued by the Foreign Process Section of the High Court confirming service of the above US proceedings on Playshare plc, Grand Monaco Ltd, Gamshare (UK) Ltd and Lucan Michael Toh.

We look forward to hearing from you as a matter of urgency with an alternative address for service for Mr Wright.

Yours faithfully

A handwritten signature in black ink that reads "Bristows". The script is cursive and fluid, with the letters connected.

Bristows

Enc.